

Equality Impact Assessment

Table 1

Author	Jack Skelly	Directorate	Housing
Date	16/08/21	Service	Housing
<p>1. The project or decision that this assessment is being undertaken for</p> <p>Allocation Policy review 2021</p> <p>As per the Housing Act 1996, every local authority in England must have an Allocation Policy to determine prioritisation and procedure for allocating housing accommodation.</p> <p>The policy is a way of distributing a small number of homes as fairly as possible, while using the resources available to us as efficiently as possible, retaining flexibility to respond to fluctuations in demand from different client groups, preventing homelessness and offering choice to applicants where we can. This policy underpins the service's work under Housing and Homelessness strategies.</p> <p>The Council has been in the process of reviewing the Allocation Policy in order to ensure it continues to operate as efficiently as possible. In November 2020, the Council launched a public consultation on its proposed major changes to the policy. These proposed changes to the policy are detailed in the Mayor and Cabinet report.</p> <p>The consultation ran between 27 November 2020 and 14 March 2021 – 16 weeks in total. The Council engaged with around 1,000 people during this time. The consultation was hosted on Lewisham's website using the online consultation portal Citizen Space. A dedicated council inbox was also made available for respondents should they wish to make direct representations or to provide additional commentary to their consultation response.</p> <p>942 individuals responded through the online survey of which 804 (85%) were Lewisham residents.</p> <p>Following the consultation, the Council agreed to remove its proposal to not include adult children in a new overcrowded by 3 bedroom rehousing reason.</p> <p>Over 50% of all respondents agreed with the following questions:</p> <ul style="list-style-type: none"> • Do you agree that we should consider placing rehousing reasons in priority bands as outlined in Table 1? • Do you agree that we should consider introducing a new 'overcrowded by three bed' group? • Do you agree that we should consider introducing a new 'homeless with additional need priority' group? • Do you agree that we should consider changing how you bid for properties, so that you can bid for multiple properties each week? • Do you agree that we should reduce the 'Three Offer' rule to a 'Two Offer' rule for eligible groups? • To increase the number of lettings available, do you agree that we should consider operating a 'Smart Lettings' system? <p>More residents disagreed than agreed with the following proposals:</p> <ul style="list-style-type: none"> • Do you agree that we should not include adult children for the new 'overcrowded by three band'? • Do you agree that we should consider moving 'overcrowded by one bed' to a new Band 4 priority group? <p>Further information on the consultation can be found in the consultation report, available here.</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"/> Race	<input checked="" type="checkbox"/> Maternity and pregnancy	<input checked="" type="checkbox"/> Marriage and civil partnership	<input checked="" type="checkbox"/> Other, Gypsies and traveller
<input checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Gender reassignment	<input checked="" type="checkbox"/> Disability		
<input checked="" type="checkbox"/> Religion or belief	<input checked="" type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation		

The Allocation Policy denotes the way social housing is allocated to residents on the social housing register. There are currently over 10,000 households on the register and so there is a potential impact on all of the protected characteristics and other equalities factors outlined above.

The policy organises those on the social housing register into rehousing reason groups. These groups are then allocated one of four “Band Priorities”. The Band Priority determines how long an applicant to the register is likely to wait before successfully bidding for a property.

The new policy introduces new rehousing reason groups. It also reorganises certain groups from one band to another, and introduces a new Band Four. This is likely to impact the length of time some applicants will be on the housing register before successfully bidding for a property.

We believe the proposed amendments could have an impact on many protected characteristics and, in particular, on:

- Age;
- Religion;
- Ethnicity;
- Disability;
- Gender;
- Household type; and
- Gypsies and travellers

Full details of the anticipated impacts and mitigations are found in the “impact summary” table below.

3. The evidence to support the analysis

The key data used for this assessment is the service-user profile – i.e. those applying for social housing. Much of this information is provided as part of a housing application and has been sourced from the in-house system.

Applicants, however, are not required to enter data on protected characteristics in their service-user profile. Therefore the council has limited data on the protected characteristics of applicants, so we are unable to provide a detailed assessment of the impact of re-allocating groups, or forecast the impact with a significant degree of confidence.

It should be noted that the housing service has recently implemented a new integrated housing system. In time, and with a re-registration process proposed as part of the policy review, our data quality should improve over time.

Sources

Analysis has been undertaken into the profile of applicants from the below sources:

- Those who were on the Housing Register as at September 2020;
- Homelessness applications from April 2018 – August 2020, in order to establish the impacts of suggested banding changes to homeless applicants on the housing register; and
- Segments of data on clients already housed within our own stock to establish impacts of policy changes on this cohort.

Where key data is not available this has been clearly stated, alongside the action that will be taken to minimise any potential negative impact.

The analysis

Age

Housing register Age band	%
18-25	5%
26-35	22%
36-40	16%
41-50	27%
51-60	18%
61+	12%
Grand Total	100.00%

Homelessness applications Age Range	%
Less than 18	0.8%
18-25	21.4%
26-35	27.9%
36-40	12.5%
41-50	19.4%
51-60	12.4%
More than 60	5.5%
Grand Total	100.00%

- The most represented age bracket in the social housing register is 41-50.
- The most represented age bracket in homelessness applications is 26-35.
- The number of homelessness applications from young people aged 18-25 is significantly higher than the prevalence of this group on the housing register.
- The consultation did not collect data on age range.

Ethnicity

Housing register Ethnicity	%
(blank)	70.3%
English/Welsh/Scottish/Northern Irish/British	8.0%
African	6.0%
Caribbean	5.6%
Not disclosed	2.2%
Any other White background	2.0%
Any other Black/ African/ Caribbean background	1.2%
Any other ethnic group	1.2%
White and Black Caribbean	0.8%
Any other Asian background	0.8%
Any other mixed/ multiple ethnic background	0.5%
Chinese	0.4%
Irish	0.3%
White and Black African	0.2%
Indian	0.2%
Bangladeshi	0.2%
Pakistani	0.2%
White and Asian	0.1%
Arab	0.0%
Grand Total	100.00%

Homelessness applications Ethnicity	%
Black African	23.50%
Black Caribbean	23.34%
White British	20.82%
Other Ethnicity	6.62%
Refused to declare	6.04%
White Other	6.01%

White & Caribbean	4.31%
Black Other	2.48%
White & Asian	2.27%
Other Mixed	1.15%
Indian	0.74%
Arab	0.70%
White & African	0.64%
Chinese	0.53%
Pakistani	0.40%
Bangladeshi	0.30%
White Irish	0.08%
Gypsy/Irish Traveller	0.05%
Other Asian	0.02%
Grand Total	100.00%

- The data regarding the ethnicity of applicants on the general housing register is limited, with more than 70% of those not disclosing their ethnicity. Most applications to the general housing register are made online so a large number of applicants are choosing not to disclose this data.
- We do, however, hold high quality data about the ethnicity of residents who make an application of homelessness, as this is collected by officers from the applicants. This is shown in the second table above.
- This shows that over half of homeless households from the past year have been from Black, Asian and Minority Ethnic households.

Ethnicity (Lewisham Homes tenants)	Proportionally over-represented in overcrowded cohort
Black African	17.40%
Other Ethnicity	2.00%
Refused to declare	2.00%
White & Other	0.50%
Other Mixed	0.50%
White & African	0.40%
Bangladeshi	0.20%
White & Caribbean	0.10%
White & Asian	0.10%
Pakistani	0.00%
Indian	-0.10%
Arab	-0.10%
White Irish	-0.20%
White Other	-0.20%
Black Other	-0.50%
Chinese	-0.50%
Other Asian	-0.60%
Black Caribbean	-8.50%
White British	-12.70%

- The above table is an assessment of overcrowded households within our own stock (Lewisham Homes) compared to the total number of households in that cohort. The percentages demonstrate whether particular ethnicities are over or underrepresented in the overcrowded cohort.
- The numbers show that people of Black African origin are disproportionately represented in the overcrowded cohort.

- With regards to the consultation:
 - 39% of all respondents were black and 31.2% were white.
 - Respondents who are Black British, Black Caribbean, Black Other, Mixed or Other all disagreed more than they agreed with the proposal to move overcrowded by one bed in to band 4. Respondents who are Asian, Black African, White British or White Other were more likely to agree than disagree with this proposal.
 - The majority of respondents were in favour of the rest of the changes that are being implemented.

Maternity

- A small number of applicants on the housing register (less than 2%) are listed as pregnant.
- In the consultation:
 - respondents who are currently pregnant were more likely to disagree (50%) with the proposal to move overcrowded by one bedroom into band 4. Those who are not currently pregnant and have not been in the past six months were also more likely to disagree (47.1%) with this proposal. Those who have been pregnant in the last six months were more likely to agree with this proposal than to disagree with it although less than half were in agreement (46.2%).
 - Less than half of respondents who are currently pregnant agreed with the proposal to reduce the three offer rule to a two offer rule for eligible groups, although they were more likely to agree with this proposal (43.5%) than to disagree with it (34.8%). Over half of respondents in the other groups agreed with this proposal.
 - The majority of respondents agreed with the remaining changes that are being implemented.

Language spoken

- We do not have data on language spoken in the data extract; however Lewisham's Joint Strategic Needs Assessment 2019 suggests that there are over 170 languages spoken in Lewisham. Communications on policy changes will need to be sensitive to people's language needs, as will our working processes and customer service delivery.
- Paper consultations and translations in other languages were available upon request. Those whose first language was not English and wanted to input their views were able to send us an email with their details and their chosen language, following which contact was made with the assistance of Language Line to collect their views in their desired language. This was communicated to residents throughout the consultation and was translated into a number of languages on the front page of the online consultation.

Gender

- Almost a quarter of applicants on the housing register are female. This is most likely because there are more single women with dependent children accepted onto the register (as dependent children is indicative of a priority need).
- 57.8% of homeless applicants in the extract analysed were female.
- With regards to the consultation:
 - 48.3% of female respondents disagreed with the proposal to move overcrowding by one bed to band 4. An equal number of male respondents agreed and disagreed with the proposal (43.5%) as did other respondents (50%).
 - 55.4% of all females agreed that the three offer rule should be reduced to two offers for eligible groups, and 52.5% of males agreed with this proposal. 25% of those who identified as other agreed with this proposal and 50% disagreed.
 - Those who identified as other were more likely to disagree (50%) with the proposal to introduce a 'Smart Lettings' scheme than agree (25%). 64.9% of all female respondents and 69.3% of all male respondents agreed with this proposal.
 - Male (63.5%) and Female (69.1%) respondents were in agreement with the proposal to introduce a new category of Homeless with additional needs. 50% of those who identified as other disagreed with this proposal.
 - The majority of Male (52.5%) and Female (56.4%) respondents agreed to the proposal to set the rehousing reasons in the banding set out in table 1 in the consultation. 25% of those

who identified as other agreed with this proposal, a further 50% disagreed and 25% did not know.

- There was broad agreement regarding the other policy changes.

Gender identity

- 1.48% of applicants on the housing register have identified as transgender
- There is no data for gender identity within homeless applicants.
- With regards to the consultation:
 - 42.9% of respondents whose gender identity is different to that assigned at birth agreed with the proposal to introduce a new homeless with additional need category and 42.9% disagreed. 69.5% of those whose gender identity is the same as that assigned at birth agreed with this proposal.
 - Respondents from both groups were more likely to disagree with the proposal to move those who are overcrowded by 1 bed into band 4. 71.4% of those whose gender identity is different to that assigned at birth disagree with this proposal and 47% of those whose gender identity is the same as that assigned at birth agree with this proposal.
 - Less than half of respondents whose gender identity is different to that assigned at birth (42.9%) disagreed with the proposal to place the rehousing reasons in the bands outlined in table 1 in the consultation, however even fewer (28.6%) agreed with the proposal. More than half of those whose gender identity is the same as that assigned at birth agreed with this proposal.
 - Respondents from both groups were more likely to agree with the proposal to change the three offer rule to a two offer rule for eligible households, however less than half of those whose gender identity is different to that assigned at birth agreed with this proposal (42.9%).
 - 42.9% of respondents whose gender identity is different to that assigned at birth disagreed with the proposal to introduce a 'Smart Lettings' policy with 28.6% in agreement. 69% of those whose gender identity is the same as assigned at birth agreed with this proposal.

Disability

- Over 16% of applicants on the housing register have declared a disability.
- As at August 2020, there were 149 households on the housing register awaiting accessible social housing. 109 of these households were already in social housing not currently suitable for their needs. At least 15 were in temporary accommodation.
- Less than 1% of homelessness applicants in the extract declared a disability; however this relates to lead applicant only.
- With regards to the consultation:
 - Less than half of respondents who consider themselves to be disabled agreed with the proposal to introduce a new overcrowded by three bed priority reason (45.4% compared to 42.1% in disagreement). 62.7% of respondents who do not consider themselves to be disabled agreed with this proposal.
 - Respondents who consider themselves to be disabled were more likely to disagree (45.0%) than agree (39.1%) with the proposal to move overcrowded by one bed into band 4. Respondents who do not consider themselves to be disabled were also more likely to disagree (48.4%) than agree (38.5%) with this proposal.
 - There was broad agreement from respondents regarding the other changes that are being implemented.

Household type

Minimum bedroom need	%
0	0.24%
1	17.00%
2	38.73%
3	33.83%
4	7.75%
5	1.88%

6	0.40%
7	0.12%
8	0.04%
9	0.01%
Grand Total	100.00%

- Household type is not collected in housing register data; however the minimum number of bedrooms required gives us an idea of the sizes of the households. Almost three quarters of households waiting for social housing need a minimum of 2 or 3 bedrooms.
- As expected, larger households are more likely to be affected by overcrowding. 635 households within the Council's own stock (Lewisham Homes) are overcrowded by more than one bedroom. Almost three quarters of these households have 5 or more occupants, suggestive of families with more children or multi-generational households.
- 812 households within our own stock are overcrowded by 0.5-1 bedroom. Almost half of this cohort are a household of 6 occupants.
- According to the 2014-based CLG household projections, the number of households with children is expected to increase by around 6,300 over the period 2018–2033.
- With regards to the consultation:
 - Over 70% of respondents not in social housing agreed with the proposal to introduce a new 'Overcrowded by three bed group' whereas only 49% of those in social housing did.
 - Social renters were the most likely to disagree (55%) with the proposal to move overcrowding by one band into a new band 4. Those in temporary accommodation were slightly more likely to agree to this proposal (44%) than disagree (40%) and only home owners and those in supported housing agreed by more than 50%.
 - Private renters (46.7%) and those in other accommodation (39.5%) were the least likely to agree with the proposal to reduce the three offer rule to a two offer rule, but were more likely to agree than disagree. All other groups agreed with this proposal by more than 50%.

Religion

Religion	%
Not disclosed	58.33%
Christian (all denominations)	23.93%
None	9.82%
Muslim	5.43%
Any other religion/belief	0.82%
Prefer not to say	0.74%
Buddhist	0.45%
Hindu	0.41%
Sikh	0.03%
Jewish	0.03%
Grand Total	100.00%

Religion, overcrowded by 2 bed+	%
Not disclosed	46.77%
Christian (all denominations)	28.67%
Muslim	13.98%
None	9.50%
Any other religion/belief	0.72%
Prefer not to say	0.18%
Buddhist	0.18%
Grand Total	100.00%

- Over 50% of housing register applicants have not disclosed a religion.
- Out of the remaining applicants, almost a quarter have identified as Christian. The next most prevalent declaration is 'no religion', followed by Muslim.
- When looking at households on the register that are overcrowded by 2 bedrooms or more, those who are Muslim are overrepresented (almost 14% even though they account for only 5.4% of the overall register), suggesting that any changes to policy relating to overcrowding may have a disproportionate affect on this group.
- Religion data is not available for over 75% of Lewisham Homes tenants.
- For homelessness applications, religion data is held on less than 10% of clients, so meaningful analysis is not possible.
- With regards to the consultation:

- Respondents who identify as Christian (47.5%), Jewish (100%), Other (45%) or having no religious belief (48.5%) were more likely to disagree with the proposal to move overcrowding by one bed into band 4 than to agree to it. Respondents who identify as Buddhist (100%), Hindu (75%) or Muslim (46.7%) were more likely to agree to this proposal than to disagree with it.
- Half of the respondents who identify as Jewish disagreed with the proposal to place the rehousing reasons in the bands outlined in table 1 in the consultation, with the remaining 50% responding that they did not know.
- Half of the respondents who identify as Hindu agreed with the proposal to reduce the three offer rule to a two offer rule for eligible households, with the remaining half of respondents who identify as Hindu disagreeing with this proposal. 50% or more of respondents from all other groups agreed with this proposal.
- Half of the respondents who identify as Jewish agreed with the proposal to introduce the 'Smart Lettings' policy, with the remaining half of respondents who identify as Jewish disagreeing with this proposal.
- There was broad agreement with the remaining policy changes.

Carer status

- There is no data for carers within the housing register or homelessness applications.
- With regards to the consultation:
 - 57.8% of respondents with caring responsibilities and 44.3% of those without caring responsibilities disagreed with the proposal to move overcrowded by one bed households into band 4. 29.2% of those with caring responsibilities and 41.9% of those without caring responsibilities agreed with this proposal.
 - There was broad agreement with the remaining policy changes.

Sexual orientation

- Over half of applicants on the housing register have not disclosed their sexual orientation.
- 44% have identified as straight / heterosexual.
- Less than 1% have identified as gay, lesbian, bisexual or other.
- With regards to the consultation:
 - Respondents who identify as gay or lesbian were more likely to disagree (46.7%) with the proposal to introduce an overcrowded by three bed category than to agree (40%) with this proposal. Over 50% of respondents in all other groups agreed with this proposal.
 - Over half of those who identify as bisexual (51.9%) or gay or lesbian (53.3%) disagreed with the proposal to move overcrowded by 1 bed into band 4. Respondents who identified as straight or heterosexual were more likely to disagree (47.3%) with this proposal than to agree with it (38.2%). More than half of those who identified as other agreed with this proposal.
 - 57.1% of respondents who identify as gay or lesbian disagreed with the proposal to place the rehousing reasons in the bands outlined in table 1 in the consultation. 50% of those who identify as bisexual agreed with this proposal and more than half of those who identify as other or as straight or heterosexual agreed with this proposal.
 - More than half of respondents who identify as gay or lesbian (53.3%) disagreed with the proposal to reduce the three offer rule to a two offer rule for eligible households. 50% of those who identified as other agreed with this proposal and 50% disagreed. All other groups were more likely to agree than disagree with this proposal although less than half of those who identify as bisexual (40.7%) agreed.
 - There was broad agreement with the remaining policy changes.

Income

- By definition, all applicants on the housing register are on low incomes and / or in receipt of housing benefit or Universal Credit.

Other - Gypsies and Travellers

- The local connection rule in section 2.2.2 of the policy is capable of having an indirectly discriminatory effect on refugees, who will find it harder to satisfy the requirement of 5 years'

residence in borough for reasons which are connected to their immigration status. This group will predominantly comprise people from ethnic minorities. Therefore, in order to avoid any discriminatory effect, an exception has been inserted into the policy for refugees who have not been resident in Lewisham for a period of 5 years for reasons connected with their status as a refugee.

“You and your household are Roma or Irish Travellers and you have not been resident in Lewisham for a period of 5 years because you adhere to a traditional migratory culture.”

4. Impact summary

A full impact is provided in the impact summary table, below.

5. Mitigation

Mitigations are provided in the impact summary table, below.

6. Service user journey that this decision or project impacts

If you think you may become homeless, you should contact the Council for advice at the earliest opportunity. The earlier you contact us the more chance we have of helping you to avoid becoming homeless. You can call the **Housing Options Centre [HOC]** on 020 8314 7007 or e-mail HOC at HousingOptionsEnquiry@lewisham.gov.uk.

If you want to join the housing list you can do this by referring to our information on the website www.lewisham.gov.uk or <http://www.lewisham.gov.uk/myserVICES/housing/find/Pages/Apply-for-social-housing.aspx>.

For advice about your housing options, please contact the **Allocations and Lettings Service** on 020 8314 7007 or LewishamFindYourHomeApplications@lewisham.gov.uk.

If you are vulnerable (for example you are elderly, have learning or other disability, or do not have the ability to read English or another language) we can assist you in accessing housing and bidding for properties. The **Homeseach Support Officer**, based in the Allocations and Lettings Service, assists applicants to engage with the choice based lettings system and can assist clients with bidding. Please contact the Allocations and Lettings Service for further information on 020 8314 7007 or LewishamFindYourHomeApplications@lewisham.gov.uk.

Single Homelessness Intervention and Prevention (SHIP): The Council is committed to working with partner agencies to promote housing options for single young people and there are a number of supported housing schemes that may be suitable for your needs funded throughout the borough. For more information on how to access these schemes please contact the SHIP service at SHIP@lewisham.gov.uk or 020 8314 7007.

Consultation contact: Jack Skelly – jack.skelly@lewisham.gov.uk

**Signature of
Head of Service**

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

Table 2 – Equality Impact Assessment summary

Purpose of this document: This table lists the proposed major changes to the Allocations Policy, and indicates any protected characteristic group that may be positive or negatively impacted by the proposed change. The impacts have been assessed and potential mitigation explored.

The Council has limited data on the protected characteristics of applicants. Therefore we are unable to provide a detailed assessment of the impact of re-allocating groups, or forecast the impact with a significant degree of confidence.

#	Section	New policy	Protected characteristic groups potentially impacted by change	Assessment of impact	Mitigation
1	Allocation Scheme, 2.5.1-2.5.5	<p>1. The new banding will be:</p> <ol style="list-style-type: none"> 1. Band 1: Emergency 2. Band 2: High 3. Band 3: Medium 4. Band 4: Low <p>2. The following band changes will be introduced:</p> <ol style="list-style-type: none"> 1. Homeless with additional need will be moved to “High”; 2. We will use the Private Renter Sector Discharge Policy and Location Priority Policy to determine whether an applicant is homeless with additional need. 3. Current cohorts within “High” band will be placed in “Medium” band (unless otherwise stated); 4. Medical High moved in to “High” (instead of “Medium”); 	<ol style="list-style-type: none"> 1. Disability 2. Religion 3. Household type 4. Age 5. Ethnicity 6. Gender 	<ol style="list-style-type: none"> 1. Placing rehousing reason groups in different Band Priorities, compared to the 2017 Policy, is likely to impact the length of time they will be on the housing register before securing a property. 2. The Counsel has limited data on the protected characteristics of applicants. Therefore we are unable to provide a detailed assessment of the impact of re-allocating groups, or forecast the impact with a significant degree of confidence. 3. We anticipate, however, that the proposed policies may impact in the following ways: <ol style="list-style-type: none"> 1. Moving “overcrowded by two” in to Band 3: Medium Priority, and “overcrowded by one” to Band 4: Low Priority, may impact those with “religion”, “household type” or “ethnicity” protected characteristics. Individuals with these characteristics are more likely to have larger households than the national average, and so 	<ol style="list-style-type: none"> 1. We are introducing an “overcrowded by three” rehousing reason in Band Two. This will allow some larger households to move more quickly than they are currently able. 2. The introduction of a statutorily overcrowded measurement, which will be used in conjunction with an overcrowded bedroom measurement in determining applicants’ overcrowding severity, will mean that some households are promoted where overcrowding is particularly acute. Households that are statutorily overcrowded and not overcrowded as per the bedroom standard will now be able to join the housing register in Band 4. 3. Communications on policy changes will need to be sensitive to people’s

	<p>5. Supported Housing Move On moved to “High” (instead of “Medium”)</p> <p>6. We will introduce a new overcrowding policy. If you are both overcrowded by one or two bedrooms and statutorily overcrowded, you will be promoted to a higher band. Households who are statutorily overcrowded but not overcrowded as per the bedroom standard will be able to join the housing register in Band 4.</p> <p>E.g. overcrowded by 1 bed and statutorily overcrowded will be in “Band 3: Medium” priority.</p> <p>7. We will introduce an “overcrowded by 3 bed” cohort in “High”;</p> <p>8. All previous “Band 3 Priority” will remain in “Band 3 Medium Priority” except for:</p> <ul style="list-style-type: none"> ▪ Overcrowded by 1 bed, which will be placed within “Low” priority. 		<p>be experiencing overcrowding. Individuals of Black African ethnicity are disproportionately represented in the overcrowded cohort. Placing this rehousing reason in Band 3 is likely to increase the time an applicant will wait in order to successfully bid for social housing.</p> <p>2. Implementing the banding structure may allow those with a disability to move more quickly within the “medical high” rehousing reason, which will be placed within Band Two.</p> <p>3. The changes may allow younger applicants to move more quickly within the “Supported Housing Move On” rehousing reason, which will be placed within Band Two.</p> <p>4. The changes may allow individuals with specific “ethnicity”, “gender” and “age” characteristics to move more quickly within the “Homeless with additional need” rehousing reason, which will be placed within Band Two. This is because the data shows that:</p> <ul style="list-style-type: none"> ▪ a disproportionate number of homelessness applications are from Black African and Black Caribbean ethnicities; ▪ a high number of applicants are aged between 26 and 35; ▪ The number of homelessness applications from young people aged 18-25 is significantly higher 	<p>language needs, as will our working processes and customer service delivery.</p> <p>4. Officials will monitor lets that are offered and keep data on protected characteristics to ensure groups are not discriminated against.</p> <p>5. The Council operates a number of services, including Allocations and Lettings service and Housing Options service, which provide advice to residents about their housing options. These can be contacted by phone or online and can provide guidance on what housing options are viable for applicants with a range of characteristics</p> <p>6. The Council provides help for those who wish to access housing or bid for properties on the housing register that are vulnerable (e.g. those who are elderly, have a disability or do not have the ability to read English or another language)</p> <p>7. The Council also runs a number of social care pathways (e.g. the young persons’ pathway) and other support initiatives (Single Homeless Intervention and Prevention service) to</p>
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				<p>than the prevalence of this group on the housing register; and</p> <ul style="list-style-type: none"> ▪ 57.8% of homeless applicants in the data extracted were female. 	support specific homeless cohorts.
2	Allocation Scheme	<ol style="list-style-type: none"> 1. We propose ring-fencing properties, whereby Council ring-fences a percentage of properties to enable transfer of tenants (“smart letting”). 2. We will ring-fence up to 20% of properties to residents who are both currently in social housing and on the housing list, so that they are able to move to a house more suited to their need. 	<ol style="list-style-type: none"> 1. Disability 2. Age 3. Religion 4. Ethnicity 	<ol style="list-style-type: none"> 1. Smart letting will prioritise initially transferring applicants but overall the impact of the policy will be neutral as the properties that are released from the transferring tenants will go to non-transferring applicants. 2. Smart letting may improve the likelihood of individuals with “disability” characteristics successfully bidding for a property, as scarce properties that are suitable for those with disabilities may be let using this system. 16% of applicants on the housing register have declared a disability. As at August 2020, there were 149 households on the housing register awaiting accessible social housing. 109 of these households were already in social housing not currently suitable for their needs. At least 15 were in temporary accommodation. 	<ol style="list-style-type: none"> 1. Officials will monitor lets that are offered via the ‘smart lettings’ scheme and keep data on protected characteristics to ensure groups are not discriminated against. 2. Communications on policy changes will need to be sensitive to people’s language needs, as will our working processes and customer service delivery.
3	Allocation Scheme, 2.2.	<ol style="list-style-type: none"> 1. We will change the “Three Offer” rule to a “Two Offer” rule for the number of properties that can be refused. 	<ol style="list-style-type: none"> 1. Disability 2. Ethnicity 3. Religion 4. Age 5. Household type 6. Gender 	<ol style="list-style-type: none"> 1. Reducing the number of offers for “overcrowded by two” and “overcrowded by one” to One Offer, may impact those with “religion”, “household type” or “ethnicity” protected characteristics. Individuals with these characteristics are more likely to have larger households than the national average, and so be experiencing overcrowding who will have a reduced number of refusals for properties. Individuals of Black African ethnicity are disproportionately 	<ol style="list-style-type: none"> 1. The Council provides help for those who wish to access housing or bid for properties on the housing register that are vulnerable (e.g. those who are elderly, have a disability or do not have the ability to read English or another language) 2. The Council operates a number of services, including Allocations and Lettings service and Housing

				<p>represented in the overcrowded cohort.</p> <ol style="list-style-type: none"> 2. Reducing the number of offers for those with specially adapted homes, “medical high” and “medical low” rehousing reasons may impact individuals with “disability” who will have a reduced number of refusals for properties. 3. Implementing the reduced number of offers may impact individuals with specific “ethnicity” and “age” characteristics to, as this will reduce the number of refusals those with “Homeless with additional need” and “homeless without additional need” rehousing reasons can make. This is because the data shows that: <ol style="list-style-type: none"> 1. a disproportionate number of homelessness applications are from Black African and Black Caribbean ethnicities; 2. a high number of applicants are aged between 26 and 35; 3. The number of homelessness applications from young people aged 18-25 is significantly higher than the prevalence of this group on the housing register; and 4. 57.8% of homeless applicants in the data extracted were female 	<p>Options service, which provide advice to residents about their housing options. These can be contacted by phone or online and can provide guidance on what housing options are viable for applicants with a range of characteristics</p> <ol style="list-style-type: none"> 3. Officials will monitor lets that are offered via the ‘smart lettings’ scheme and keep data on protected characteristics to ensure groups are not discriminated against. 4. The Council also runs a number of social care pathways (e.g. the young persons’ pathway) and other support initiatives (Single Homeless Intervention and Prevention service) to support specific homeless cohorts. 5. Communications on policy changes will need to be sensitive to people’s language needs, as will our working processes and customer service delivery.
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