HARINGEY COUNCIL

EQUALITY IMPACT ASSESSMENT FORM

Service: Strategic and Community Housing Services

Directorate: Urban Environment

Title of Proposal: New Proposed Housing Allocations Policy

Lead Officer: Phil Harris – Assistant Director

Names of other Officers involved: Zulfiqar Mulak, Ferzana Ali, Mustafa Ibrahim and Rosie Green.

Step 1 - Identify the aims of the policy, service or function

State what effects the proposal is intended to achieve and who will benefit from it.

Haringey's Housing Register is a local register of housing need. All applicants seeking social housing in Haringey must apply through its Housing Register.

The demand for housing exceeds supply and the Housing Register exists to enable the Housing Allocations Policy to prioritise those households that are in greatest need and to maximise their opportunities for rehousing.

The Register also provides information on local needs which the Council and its partners use to develop new affordable housing.

The Housing Allocations Policy sets out:
    The objectives of the Housing Allocations Scheme
    How the Housing Register operates
    Who is eligible to be rehoused
    How applicants' housing needs are assessed
    How social rented homes are let
    How the choice based lettings allocations scheme op

The Housing Allocations Scheme will operate through a choice based lettings (CBL) IT system and a Housing Allocations Policy. However, there may be local variations in order to make best use of social housing, in which case eligibility for properties will be clearly labelled in the advertisement.

The system is designed to be easy to use, and allows applicants to have an understanding of their housing situation, enabling them to make the best choice from the full range of housing options available to them.

Partner organisations

Homes for Haringey (which manages homes on behalf of the Council) manages the largest stock of social housing in the borough.

All of the homes that Homes for Haringey manages are let in accordance with this Housing Allocations Policy.

Registered social landlords (often referred to as 'housing associations') may advertise their available homes through the choice based lettings scheme. Where nomination arrangements exist and the Council has the right to nominate prospective tenants to a property, the landlord will be normally be required to advertise the vacancy through the scheme.

Objectives of the Proposed Housing Allocations Scheme is to:

To meet the legal requirements for the allocation of social housing as set out in Part 6 of the Housing Act 1996 (as amended by the Homelessness Act 2002)

The Council will ensure that its Housing Allocations Policy complies with all legislative requirements, related legislation, case law, local policies and strategies.

To provide a system of choice in housing

The Council and its partners will develop the Housing Allocations Policy in accordance with the principles agreed locally. All assessments of need and allocations will be made in accordance with the agreed Policy.

The Housing Allocations Scheme aims to provide applicants with sufficient information to explain where homes are more likely to become available. This will allow them to make informed choices about their housing options.

To produce a system that applicants can understand and which is both open and fair

In order to ensure that it is consistent, fair and transparent, the Housing Allocations Scheme will include:
    Comprehensive feedback on the homes that have been let
    Adoption of a common housing needs banding structure
    Clear labelling of the properties advertised
    Detailed procedures for needs assessment and allocations
    Performance management information
    A consistent review process.

To increase the sustainability of local communities

Homes may be advertised with criteria aimed at improving the long-term stability of

a community. In such cases, properties will be clearly advertised to show that special criteria apply.

To assist in minimising homelessness and assist applicants in the highest assessed need

All applicants will have their housing needs assessed and be placed in a housing needs band according to their circumstances. This will take into account the reasonable preference criteria outlined in the Housing Act 1996 (as amended by the Homelessness Act 2002).

Homes will generally be let to the applicant in the highest housing needs who has been waiting the longest, having expressed an interest in the home and meeting the criteria advertised.

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To minimise the use of temporary accommodation

A system of auto-bidding, together with the provision of comprehensive advice on housing options, will markedly reduce the length of time that applicants have to stay in temporary accommodation

To ensure that vulnerable applicants are supported

Vulnerable people will be appropriately supported to access the Housing Allocations Scheme.

A number of measures will be taken to ensure that vulnerable applicants are not disadvantaged such as:
    Providing appropriate advice and assistance
    Translating documents on request
    Providing information in other formats on request
    Partnership working with support agencies
    Undertaking monitoring and regular reviews of the allocations policy
To ensure that vulnerable groups are not disadvantaged by the Housing Allocations Scheme, the Council and its partners will put in place appropriate support systems and a full monitoring system to ensure that vulnerable people are successfully using the scheme.

To aim to provide a comprehensive housing options service to increase the housing opportunities for all

The scheme will be developed to enable the applicant to see all of their housing options, including:
    Available homes managed by Homes for Haringey, registered social landlords, charities and voluntary organisations
    Affordable home ownership
    Mutual exchanges
    Available private rented accommodation.

To ensure organisations to make best use of homes and in particular adapted properties

Properties that have been adapted or developed for people with a disability will be advertised as such and, due to the shortage of adapted properties, preference will be given to households needing that adaptation. Property advertisements will show which groups may express an interest in them.

How the Housing Allocations Scheme will operate

Haringey is part of the Home Connections choice based lettings scheme. This is the choice based lettings scheme operating in North London

Applicants who join Haringey's Housing Register are placed in one of five Housing Needs Bands to reflect their housing need.

Most vacant homes are advertised for a set period of time on a regular basis. This is called an "advertising cycle".

Applicants can only express an interest in the homes for which they are eligible. They must, for example, meet the criteria for the number of bedrooms in the home.

They may express an interest by telephone, email, text message, through the website or by calling in person at one of the Council's Customer Service Centres or the Broadwater Farm Neighbourhood Office.

Once the deadline of the advertising cycle is reached, a shortlist of the applicants who have expressed an interest is provided by the IT system.

The Housing Allocations Policy is then used to determine who is prioritised for housing from the shortlist.

Feedback on lettings is made when a property has been let.

The feedback will include information about the priority and effective date of the successful bidder.

There are three key elements to assist the planned implementation of the new policy. These are ensuring applicants are in correct bands based on their current points, re-registration of current applicants and ensuring that a comprehensive equality impact assessment is carried out which looks at the impact of the new policy on the diverse communities in the borough.

Housing Needs Bands

A critical element in implementing the new Housing Allocations Policy is to ensure that existing applicants on the housing register are placed in the correct housing needs band in accordance with the new policy. To assist this process, a detailed modelling exercise has been undertaken to determine the band into which each applicant will be placed.

The modelling exercise has shown that, based on the information available, there will be 394 applicants in Band A, and 3,725 applicants in Band B. In order to notify the remaining 16,566 applicants of their provisional banding (Band C, D or E) in January 2011, the modelling exercise will be completed in November 2010.

The modelling exercise for Bands A & B has been robust and is consistent with the previous estimates for these bands. Applicants in these two bands will be notified in December 2010 that they have been placed in these bands and will be able to continue bidding for properties in the normal way.

Applicants in Bands C, D & E will be notified of their provisional bands and asked to re-register between January and March 2011. Details of the re-registration process are set out below.

A number of changes have been made to the categories in each band as a result of the issues and concerns raised during the consultation. The revised categories in each band are set out in step 4 below.

Re-Registration

Our highest priority applicants (Bands A and B) will not be required to re-register. They will be notified in December 2010 of the policy change and the impact this will have on their position on the housing register, based on the band they are in and their effective date instead of their number of points.

As explained in paragraph 6.3 above, the number of applicants in Bands A and B is currently 3,911. As most of these applicants are either in temporary accommodation provided by the Council or are council tenants seeking alternative accommodation (through a management transfer or the under occupation scheme), the Council already has sufficient information to determine the band into which these applicants should be placed. At this stage, therefore, these applicants will not be asked to re-register.

The remaining 16,566 applicants on the existing housing register will be required to re-register within the defined period, starting in January and ending on 1 April 2011. Each applicant will be notified of a provisional banding (C, D or E) based on the information currently held by the Council and will be asked to confirm that they wish to remain on the housing register and to complete the new application form. Applicants will have three choices for the completion of their form:

- **Use of the online application form via the Council's website**: applicants will be provided with the required details for this (including a secure PIN) and will be able to use public access computers in Council buildings for this purpose. The form will be available in community languages, and written guidance and support will be provided by local staff.

- **In person, by appointment, at designated Council offices**: applicants will be helped to complete the online application form. At Apex House, opening hours will be extended (to include evenings and weekends) to assist applicants who cannot attend during the day. Interpreters will be arranged as required.

- **At home, by appointment**: applicants whose mobility is restricted and who cannot attend an interview at one of the Council's offices will be visited at home by a member of staff who will help them complete the form. Interpreters will be arranged as required.

    All correspondence will be in the appropriate language (where we have this information) or will be translated on request. In addition to the initial letter requiring re-registration, applicants will receive two reminders. Regular use will be made of Council publications and the website to advertise the re-registration exercise. An extensive communications plan has been developed to ensure that stakeholders and partners are informed and that they are able to help applicants to successfully complete the re-registration process.

During the re-registration period, applicants will not be able to bid for properties until their re-registration is completed. Applicants who do not re-register within the time period, or do not contact us in anyway, will have their applications cancelled. Under the Housing Act 1996 Section 167, applicants have the right of appeal against a decision to cancel their application but the re-registration arrangements have been designed to ensure that applicants are given every opportunity to re-register, with safeguards built in to support vulnerable clients. Appropriate arrangements to ensure widespread communication and the removal of any barriers to re-registration are planned.

During the preparation for the re-registration it will be necessary to limit new applications to join the register to high priority cases only. This is to ensure that routine applications using the paper form do not have to be processed at a time when workload will be very high. This restriction will apply for a period of up to a month, but has been planned to run over the Christmas/New Year period when demand is lower and to coincide with the regular, seasonal closure of the Home Connections choice based lettings scheme. During this period, all high priority applications will be registered, face to face, by housing staff.

You should gather all relevant quantitative and qualitative data that will help you assess whether at presently, there are differential outcomes for the different equalities target groups – diverse ethnic groups, women, men, older people, young people, disabled people, gay men, lesbians and transgender people and faith groups. Identify where there are gaps in data and say how you plug these gaps.

In order to establish whether a group is experiencing disproportionate effects, you should relate the data for each group to its population size. The 2001 Haringey Census data has an equalities profile of the borough and will help you to make comparisons against population sizes.

www.haringey.gov.uk/census_statistics

2 a) Using data from equalities monitoring, recent surveys, research, consultation etc. are there group(s) in the community who:
- *are significantly under/over represented in the use of the service, when compared to their population size?*
- *have raised concerns about access to services or quality of services?*
- *appear to be receiving differential outcomes in comparison to other groups?*

There are an estimated 226,000 households in Haringey

- A high proportion of households live in social rented accommodation - an estimated 30% (18% council stock, 11% Housing Association).

- Just under half of Haringey's households are owner occupiers.

- Approximately 22% of households live in private rented accommodation.

- Single occupier households account for 36% of all households in the borough (close to the London average of 35%)

- There is excess demand for social housing and high demand for private rented accommodation.

- The average property price in Haringey in November 2009 was £315,634 compared to a London average of £324,231. House prices rose by 95% over 2002 – 07.Whilst prices are falling, the long term trend in house prices is for prices to increase.

- The need for affordable housing outstrips supply with a shortfall in provision of 4,865 units per annum or 52 per 1,000 per head of the population.

- Residents from Black and Black British backgrounds are over-represented amongst Haringey's social rented residents, with 40% of Black African and Asian households living in unsuitable accommodation.

- Residents from Black African and Black Caribbean backgrounds are overrepresented on Haringey's housing register

- We are reducing the number of households in temporary accommodation (TA) faster than any other authority. As at 31st March 2010, 3,547 households were in TA, compared to our 2008/09 figure of 4,548.

The equalities impact has been assessed for;

- those prioritised by the existing policy
- those households given priority in the new policy (i.e. bands A and B, whom we expect to be rehoused first)
- those not prioritised by the existing policy
- those households not given priority in the new policy (i.e. bands C or lower)

There were 4115 applications which qualified for bands A and B using the agreed banding rules.

As the existing policy is points based, the top and bottom 4115 pointed applications have been used as the comparison groups for this assessment. However, it should be noted that there are data integrity issues with regards to the group of applicants in the bottom group which will only be resolved on completion of the re- registration exercise, when further information will be supplied by this client group in order for an assessment of their circumstances to be made and confirmation of Band placement provided.

As such, at this stage we are only able to indicate that there is a total of 15,858 applicants in Band C-E rather than specify or confirm the number of applicants in each of the individual Bands C-E.

A further Equalities Impact Assessment and will be undertaken in April 2011 to assess the number of actual applicants in all the Bands and the impact of the new policy since it's partial implementation in January 2011. This assessment will also consider the number of applications removed from the Housing Register due to either a lack of response to the re-registration requirement or as a result of ineligibility. As part of this assessment information on the number of reviews submitted and the outcome of these will also be gather.

Each of the six equalities strands for the head of each household has been compared for the two priority groups.

Due to the varying number of household members in each application, a comparison of all members of each household is likely to give misleading results, particularly in areas where our data is poor.

In addition, two analyses by household composition have been completed.

The first of the household composition analyses has been made by counting any member of the applicant household under 16 as a child, and anyone 16 or over as an adult.

The second of these has been made by looking at the relationship between the head of household and the other household members, and counting those related to the head of household as a son, daughter, son-in-law, daughter-in-law, niece, nephew, grandson or granddaughter as children (where a relationship code is not present then the age is used to determine whether a household member is an adult or child). This is a better analysis of the household at the point of application.

These household composition analyses have been grouped from the raw counts of numbers of adults and children into something more usable at the top of each page.

For each comparison group the percentage change in each group has been colour coded to make identification of changes easier ..

A summary of the changes to who we are prioritising for housing for each group is provided below as follows;

Ethnicity

There is no significant change in the ethnicities of those who we are prioritising now and those who will be prioritised in the new policy

OLD TOP 4115*

Ethnicity	Applications	pct
Any Other Ethnic Group	306	7.4%
Bangladeshi/UK Bangladeshi	79	1.9%
Black African	861	20.9%
Black British	115	2.8%
Black Caribbean	538	13.0%
Black Caribbean and White	30	0.7%
British Asian	10	0.2%
Chinese	23	0.6%
East African Asian	17	0.4%
Gypsy	0	0.0%
Indian or UK Indian	26	0.6%
Mixed Asian and White	10	0.2%
Mixed Black	13	0.3%
Mixed Black African/White	28	0.7%
Mixed Other	37	0.9%
No Response	196	4.8%
Other Asian	98	2.4%
Other Black	31	0.8%
Other White	96	2.3%
Other White European	269	6.5%
Pakistani / UK Pakistani	25	0.6%
Refused	19	0.5%
Traveller	0	0.0%
Unknown (data take on)	15	0.4%
White British	499	12.1%
White Greek Cypriot	41	1.0%

White Irish	64	1.6%
White Kurdish	255	6.2%
White Turkish	317	7.7%
White Turkish Cypriot	106	2.6%
TOTAL	**4124**	

* as there are several applications on the
same number
of points and ranked equal 4115th
with no other way
to determine who is ranked higher,
they have
all been included in
this analysis

TOP 4115 (i.e. bands A&B)

Ethnicity	Applications	pct	change
Any Other Ethnic Group	301	7.3%	-0.1%
Bangladeshi/UK/Bangladeshi	77	1.9%	-0.0%
Black African	880	21.4%	+0.5%
Black British	121	2.9%	+0.2%
Black Caribbean	515	12.5%	-0.5%
Black Caribbean and White	33	0.8%	+0.1%
British Asian	10	0.2%	+0.0%
Chinese	21	0.5%	-0.0%
East African Asian	19	0.5%	+0.0%
Gypsy	1	0.0%	+0.0%
Indian or UK Indian	23	0.6%	-0.1%
Mixed Asian and White	9	0.2%	-0.0%
Mixed Black	12	0.3%	-0.0%
Mixed Black African/White	24	0.6%	-0.1%
Mixed Other	33	0.8%	-0.1%
No Response	187	4.5%	-0.2%
Other Asian	103	2.5%	+0.1%
Other Black	35	0.9%	+0.1%
Other White	94	2.3%	-0.0%
Other White European	266	6.5%	-0.1%
Pakistani / UK Pakistani	26	0.6%	+0.0%
Refused	23	0.6%	+0.1%
Traveller	0	0.0%	+0.0%
Unknown (data take on)	20	0.5%	+0.1%
White British	492	12.0%	-0.1%
White Greek Cypriot	38	0.9%	-0.1%
White Irish	65	1.6%	+0.0%
White Kurdish	254	6.2%	-0.0%
White Turkish	325	7.9%	+0.2%
White Turkish Cypriot	108	2.6%	+0.1%
TOTAL	**4115**		

OLD BOTTOM
15867*

Ethnicity	Applications	pct
Any Other Ethnic Group	1135	7.2%
Bangladeshi/UK Bangladeshi	223	1.4%
Black African	3634	22.9%
Black British	333	2.1%
Black Caribbean	2389	15.1%
Black Caribbean and White	237	1.5%
British Asian	33	0.2%
Chinese	162	1.0%
East African Asian	141	0.9%
Gypsy	1	0.0%
Indian or UK Indian	178	1.1%
Mixed Asian and White	55	0.3%
Mixed Black	40	0.3%
Mixed Black African/White	162	1.0%
Mixed Other	104	0.7%
No Response	276	1.7%
Other Asian	375	2.4%
Other Black	137	0.9%
Other White	478	3.0%
Other White European	1185	7.5%
Pakistani / UK Pakistani	106	0.7%
Refused	18	0.1%
Traveller	2	0.0%
Unknown (data take on)	32	0.2%
White British	2361	14.9%
White Greek Cypriot	198	1.2%
White Irish	342	2.2%
White Kurdish	512	3.2%
White Turkish	700	4.4%
White Turkish Cypriot	309	1.9%
TOTAL	**15858**	

NEW BOTTOM 15867 (i.e. bands C or lower)

Ethnicity	Applications	pct	change
Any Other Ethnic Group	1140	7.2%	+0.0%
Bangladeshi/UK Bangladeshi	225	1.4%	+0.0%
Black African	3615	22.8%	-0.1%
Black British	327	2.1%	-0.0%
Black Caribbean	2412	15.2%	+0.1%
Black Caribbean and White	234	1.5%	-0.0%
British Asian	33	0.2%	-0.0%
Chinese	164	1.0%	+0.0%
East African Asian	139	0.9%	-0.0%
Gypsy	0	0.0%	-0.0%
Indian or UK Indian	181	1.1%	+0.0%
Mixed Asian and White	56	0.4%	+0.0%
Mixed Black	41	0.3%	+0.0%
Mixed Black African/White	166	1.0%	+0.0%
Mixed Other	108	0.7%	+0.0%
No Response	285	1.8%	+0.1%
Other Asian	370	2.3%	-0.0%
Other Black	133	0.8%	-0.0%
Other White	480	3.0%	+0.0%
Other White European	1188	7.5%	+0.0%
Pakistani / UK Pakistani	105	0.7%	-0.0%
Refused	14	0.1%	-0.0%
Traveller	2	0.0%	-0.0%
Unknown (data take on)	27	0.2%	-0.0%
White British	2368	14.9%	+0.0%
White Greek Cypriot	201	1.3%	+0.0%
White Irish	341	2.1%	-0.0%
White Kurdish	513	3.2%	+0.0%
White Turkish	692	4.4%	-0.1%
White Turkish Cypriot	307	1.9%	-0.0%
TOTAL	**15867**		

Haringey is a racially and ethnically very diverse borough, with many new immigrants. Some 50 % of the population and three quarters of young people are from ethnic minority backgrounds and around 200 languages are spoken on the borough.

In common with the rest of the country, BME households in Haringey are over represented on the Housing Register. They are also especially at risk of homelessness, overcrowding and disadvantage.

In London, ethnic minority households made up 23% of the population in 2001 (latest census figures), but accounted for almost 60% of those accepted as homeless by local authorities in 2004-05.

It is estimated that around 34% of Haringey residents are black or from an ethnic minority, yet the BME population accounts for 74% of people seeking advice and assistance from Haringey's Prevention and Options service.

This situation is not specific to Haringey. The Shelter (2004) BME Housing Crisis Report stated that Black African and Black Caribbean homeless households were the most over represented group across the country, accounting for 10% of homeless acceptances, as opposed to 2% of the population. A Fordham North London sub-regional study of 2005 found that Black African households are the most likely to be in housing need, both now and in the future. Black African and Black other households were also particularly likely to be living in unsuitable housing. Black households were also more likely to be single parent households.

The over-representation of BME households among homeless households reflects London trends. In 2005-06 BME households made up 67% of households accepted as homeless compared to 40%.

Reasons for over representation:
While no research has been undertaken in Haringey specifically the main reasons for over representation could be for the following reasons:
- Homelessness as a result of parents, relatives or friends asking a member of the household to leave following pregnancy, relationship breakdowns and overcrowding. Family breakdowns could be linked to the difficulties of adapting to a new environment. Life in England could lead to marital strains, particularly where men had been used to living in a society with traditional gender roles and hierarchal social relations.
- Over-crowding was linked to the arrival of family members from Africa and the birth of children.

The following data provides a breakdown of Lettings from 1st April 2009 to 2010 by ethnicity.

Ethnicity	Number Of Lettings
Any other Ethnic Group	55
Bangladeshi / UK Bangladeshi	7
Black African	151
Black British	21
Black Caribbean	154
Black Caribbean and White	11
British Asian	4
Chinese	8
East African Asian	5
Indian or UK Indian	4
Mixed Asian and White	3
Mixed Black	0
White Turkish	58
White Turkish Cypriot	19
TOTAL	**848**

An outreach service has been developed and introduced with local communities to assist with access to housing services including bidding for available social lets, advertised via the Choice Based Lettings Scheme.

Age Band

There is no significant change in the age ranges of prioritised households between the old and new policy.

OLD TOP 4115*

Age band	Applications	pct
18-24	597	14.5%
25-44	2342	56.8%
45-63	1037	25.1%
64+	134	3.2%
Unknown	14	0.3%
TOTAL	**4124**	

NEW TOP 4115 (i.e. bands A&B)

Age band	Applications	pct	change
18-24	573	13.9%	-0.6%
25-44	2357	57.3%	+0.5%
45-63	1019	24.8%	-0.4%
64+	153	3.7%	+0.5%
Unknown	13	0.3%	-0.0%
TOTAL	**4115**		

OLD BOTTOM 15867*

Age band	Applications	pct
18-24	2829	17.8%
25-44	8663	54.6%
45-63	3589	22.6%
64+	706	4.5%
Unknown	71	0.4%
TOTAL	**15858**	

NEW BOTTOM 15867 (i.e. bands C or lower)

Age band	Applications	Pct	Change
18-24	2853	18.0%	+0.1%
25-44	8648	54.5%	-0.1%
45-63	3607	22.7%	+0.1%
64+	687	4.3%	-0.1%
Unknown	72	0.5%	+0.0%
TOTAL	**15867**		

Young People (18 -24)

According to the 2001 census, the proportion of single person households in Haringey was 35%, slightly higher than London (34%). This group is comparatively represented on the Housing Register.

Older people (64+)

Older people have not been identified as over-represented in terms of those who are on the Housing Register. However, the Homelessness Strategy will help to address the

needs of older people who are in need of housing. This will be done through actions designed to support vulnerable adults.

It is possible that work may need to be undertaken to assess whether there are low numbers of older people in applying for housing because older people are settled in their homes, or because of barriers to accessing homelessness services.

This will be addressed in the Older Person's Housing Strategy due in 2010/11.

Disability

There has been an increase of just over 1% in those answering both Yes and No to these questions for those prioritised in the new policy.

The ratio of those answering yes to those answering no has remained relative constant which indicates there has been no significant shift in how disabled clients are prioritised in the new policy, but obviously the low volume of this data makes a comprehensive analysis difficult.

At a later date, we may wish to widen the definition of those with disabilities to include those with 300 medical points (which becomes a critical medical need to move in the new policy), and/or other existing points categories which might make this analysis more useful.

OLD TOP 4115*

Disability	Applications	Pct
Yes	116	2.8%
No	139	3.4%
no response	3869	93.8%
TOTAL	4124	100%

NEW TOP 4115 (i.e. bands A&B)

Disability	Applications	pct	change
Yes	173	4.2%	+1.4%
No	185	4.5%	+1.1%
no response	3757	91.3%	-2.5%
TOTAL	4115	100%	

This analyses uses the same definition as the equalities data collection report,
 i.e. to be considered as disabled the main applicant has answered yes one or more of the following questions:

Disability Or Impairment?
Learning Disability
Mental Health Condition?

OLD BOTTOM 15867*

Disability	Applications	pct
Yes	371	2.3%
No	699	4.4%
no response	14788	93.3%
TOTAL	15858	

NEW BOTTOM 15867 (i.e. bands C or lower)

Disability	Applications	pct	change
Yes	314	2.0%	-0.4%
No	653	4.1%	-0.3%
no response	14900	93.9%	+0.7%
TOTAL	15867	386%	

Disability and illness disproportionately affect homelessness people. In Haringey over 1 in 10 people of working age living in social housing have an illness or disability that prevents them from working.

At present there is a recognised gap regarding the monitoring of housing applicants with a disability in Haringey. As such, future monitoring will be recommended as an action for implementation. Whilst some data is available, it is thought to be unreliable and unsuitable for making evidence on which to base policy and service delivery. In the absence of reliable data regarding the numbers of disabled people on the Housing Register, it is only possible to provide borough-wide data and conjecture as to where the greatest housing need is amongst disabled people.

As at May 2007 there were 12,150 claimants of Incapacity Benefit or Severe Disablement Allowance is Haringey, representing 7.7% of the working age population. The claim rate in the borough is above the current England and London averages of 6.7% and 6.1% respectively. At May 2007, 56.5% of IB / SDA claimants had been in receipt of these benefits for 5 years or more – the same story is true for both London and England.

The highest concentration of IB / SDA claimants are in the east of the borough, specifically in areas in Bruce Grove, Haringey, Hornsey, Noel Park, Northumberland Park, West Green, White Hart Lane and Woodside wards. In these areas, the claim rates range from 11.8% to 15.3%. The highest concentrations of people receiving a community based service from the council to support them with physical disabilities or sensory impairment in January 2008 were in Noel Park, Bounds Green, Bruce Grove and Northumberland Park.

2001 census data shows that 15.51% of Haringey residents have a limiting long-term illness – similar to prevalence across London and slightly lower than prevalence across England. Analysis of census data by tenure shows that 22.58% of people in local authority households had a limiting long term illness (Equalities Impact Assessment – Homes for Haringey Resident Involvement Agreement 2007). These figures suggests that there is likely to be a higher than borough average number of people in TA who have a limiting long term illness.

Haringey has high levels of mental ill-health, as evidenced by the Haringey Public Health Report 2004. There are a wide number of determinants of good mental health, which contribute to the overall level of need: these include housing, unemployment and educational attainment. Mental illness is particularly common in some of Haringey's newer refugee communities, whose members have often experienced traumatic events in their home countries.

Reasons for being a priority group:
While no research has been undertaken in Haringey specifically, national research suggests that worklessness amongst people with a disability is strongly linked to homelessness and housing need.

Research by Crisis found that while the employment rate of the general homeless population is only 10%, it is even lower for homeless people with a disability, at 2%, and for homeless people with a mental health condition (also 2%). Other research undertaken

by Inclusion found that 43% of homeless people with a disability, and 40% with a mental health condition have been unemployed for more than three years.

A key strategic priority of the Homelessness Strategy is to provide choice and encourage independence by establishing formal links between Haringey's social landlords and the Rent Guarantee scheme, affording homeless households the opportunity to access training, work placement and employment opportunities**.**

Household Composition by Age

There has not been a significant shift in the household composition of prioritised applicants, although the percentage of prioritised households with children has increased slightly in the new policy.

OLD TOP 4115*

adults	children	Apps	pct
1	0	826	20.7%
1	1-2	1055	26.4%
1	3+	267	6.7%
2+	0	509	12.8%
2+	1-2	856	21.4%
2+	3+	479	12.0%
TOTAL		**3992**	
Households with children		2657	66.6%
Households without children		1335	33.4%

NEW TOP 4115 (i.e. bands A&B)

adults	Children	Apps	pct	change
1	0	772	19.4%	-1.3%
1	1-2	1041	26.2%	-0.2%
1	3+	277	7.0%	+0.3%
2+	0	491	12.3%	-0.4%
2+	1-2	872	21.9%	+0.5%
2+	3+	523	13.2%	+1.2%
TOTAL		**3976**		
Households with children		2713	68.2%	+1.7%
Households without children		1263	31.8%	-1.7%

OLD BOTTOM 15867*

adults	children	Apps	pct
1	0	8308	53.1%
1	1-2	2103	13.5%
1	3+	377	2.4%
2+	0	2055	13.1%
2+	1-2	2260	14.5%
2+	3+	529	3.4%
TOTAL		**15632**	
Households with children		5269	33.7%
Households without children		10363	66.3%

NEW BOTTOM 15867 (i.e. bands C or lower)

adults	children	Apps	pct	change
1	0	8362	53.4%	+0.3%
1	1-2	2117	13.5%	+0.1%
1	3+	367	2.3%	-0.1%
2+	0	2073	13.2%	+0.1%
2+	1-2	2244	14.3%	-0.1%
2+	3+	485	3.1%	-0.3%
TOTAL		**15648**		
Households with children		5213	33.3%	-0.4%
Households without children		10435	66.7%	+0.4%

According to the 2001 census 29.2% of Haringey's households had dependent children which is in line with London (29%).

This client group are clearly over represented on the Housing Register the main reasons for which are:

- Severe shortage of affordable housing
- Family and parental exclusions resulting in homelessness and housing need.
- 8% of households were identified as living in overcrowded households in the Housing Needs survey.

Household Composition by Relationship to Head of Household

There is no significant change in the household compositions of prioritised applicants between the old and new policy using this definition. There has been no research undertaken in this area and as such it is difficult to consider and draw any conclusions about this in relation to housing need.

OLD TOP 4115*

adults	children	apps	pct
1	0	826	20.0%
1	1-2	1426	34.6%
1	3+	562	13.6%
2+	0	69	1.7%
2+	1-2	668	16.2%
2+	3+	573	13.9%
TOTAL		**4124**	
Households with children		3229	78.3%
Households without children		895	21.7%

NEW TOP 4115 (i.e. bands A&B)

Adults	children	apps	pct	change
1	0	772	18.8%	-1.3%
1	1-2	1374	33.4%	-1.2%
1	3+	595	14.5%	+0.8%
2+	0	81	2.0%	+0.3%
2+	1-2	680	16.5%	+0.3%
2+	3+	613	14.9%	+1.0%
TOTAL		**4115**		
Households with children		3262	79.3%	+1.0%
Households without children		853	20.7%	-1.0%

OLD BOTTOM 15867*

adults	children	Apps	Pct
1	0	8308	52.4%
1	1-2	2975	18.8%
1	3+	808	5.1%
2+	0	1069	6.7%
2+	1-2	2002	12.6%
2+	3+	696	4.4%
TOTAL		**15858**	
Households with children		6481	40.9%
Households without children		9377	59.1%

NEW BOTTOM 15867 (i.e. bands C or lower)

adults	children	Apps	Pct	change
1	0	8362	52.7%	+0.3%
1	1-2	3027	19.1%	+0.3%
1	3+	775	4.9%	-0.2%
2+	0	1057	6.7%	-0.1%
2+	1-2	1990	12.5%	-0.1%
2+	3+	656	4.1%	-0.3%
TOTAL		**15867**		
Households with children		6448	40.6%	-0.2%
Households without children		9419	59.4%	+0.2%

Religion

Whilst our data volume for this equalities strand has improved dramatically, there is still too little data here to make any meaningful analysis. Furthermore, there has been no specific research into the different religions within Haringey and analysis of this in correlation to housing need.

OLD TOP 4115*

religion/faith	applicants	pct
Buddhist	1	0.0%
Christian	94	2.3%
Greek Orthodox	1	0.0%
Hindu	0	0.0%
Jedi	0	0.0%
Jehovah Witness	1	0.0%
Jewish	3	0.1%
Muslim	28	0.7%
No Religion	16	0.4%
Other	1	0.0%
Prefer not to say	11	0.3%
Rastafarian	1	0.0%
Roman Catholic	0	0.0%
No Response	3966	96.2%
TOTAL	**4123**	

NEW TOP 4115 (i.e. bands A&B)

religion/faith	applicants	pct	change
Buddhist	1	0.0%	+0.0%
Christian	137	3.3%	+1.0%
Greek Orthodox	2	0.0%	+0.0%
Hindu	2	0.0%	+0.0%
Jedi	0	0.0%	+0.0%
Jehovah Witness	2	0.0%	+0.0%
Jewish	2	0.0%	-0.0%
Muslim	51	1.2%	+0.6%
No Religion	19	0.5%	+0.1%
Other	1	0.0%	+0.0%
Prefer not to say	14	0.3%	+0.1%
Rastafarian	2	0.0%	+0.0%
Roman Catholic	1	0.0%	+0.0%
No Response	3881	94.3%	-1.9%
TOTAL	**4115**		

OLD BOTTOM 15867*

religion/faith	Applicants	Pct
Buddhist	9	0.1%
Christian	329	2.1%
Greek Orthodox	3	0.0%
Hindu	4	0.0%
Jedi	1	0.0%
Jehovah Witness	1	0.0%
Jewish	12	0.1%
Muslim	151	1.0%
No Religion	67	0.4%
Other	4	0.0%
Prefer not to say	53	0.3%
Rastafarian	3	0.0%
Roman Catholic	1	0.0%
No Response	15224	96.0%
TOTAL	**15862**	

NEW BOTTOM 15867 (i.e. bands C or lower)

religion/faith	Applicants	pct	change
Buddhist	9	0.1%	-0.0%
Christian	286	1.8%	-0.3%
Greek Orthodox	2	0.0%	-0.0%
Hindu	3	0.0%	-0.0%
Jedi	1	0.0%	-0.0%
Jehovah Witness	0	0.0%	-0.0%
Jewish	13	0.1%	+0.0%
Muslim	128	0.8%	-0.1%
No Religion	64	0.4%	-0.0%
Other	4	0.0%	-0.0%
Prefer not to say	50	0.3%	-0.0%
Rastafarian	2	0.0%	-0.0%
Roman Catholic	0	0.0%	-0.0%
No Response	15309	96.5%	+0.5%
TOTAL	**15871**		

Gender

There is no significant change in the gender of the head of prioritised households between either policy.

OLD TOP 4115*

Gender	Apps	Pct
M	1420	34.4%
F	2704	65.6%
TOTAL	**4124**	

NEW TOP 4115 (i.e. bands A&B)

Gender	Apps	Pct	Change
M	1414	34.4%	-0.1%
F	2701	65.6%	+0.1%
TOTAL	**4115**		

OLD BOTTOM 15867*

Gender	Apps	Pct
M	7264	45.8%
F	8594	54.2%
TOTAL	**15858**	

NEW BOTTOM 15867 (i.e. bands C or lower)

Gender	Apps	pct	change
M	7270	45.8%	+0.0%
F	8597	54.2%	-0.0%
TOTAL	**15867**		

Men:

The overall Haringey ratio of men to women in Haringey according to the 2001 census is 50:50. The number of men on the Housing Register is significantly lower than that of women   .

However, single men are applying for assistance under homelessness legislation and their occupation in temporary accommodation has been continuously higher than that of single women. This reflects national trends.

Reasons for over representation:

Single men are more likely to be ex-offenders, who have no home on their release. Over 14,000 prisoners are discharged into London each year from prisons both within and outside the capital, of which it is estimated half are homeless. It has not been possible to establish exact numbers of ex-offenders who are homeless in Haringey. However, there are various Supporting People schemes which aim to meet the accommodation needs of this group:

There are three different schemes in Haringey:

1. Supported accommodation for 8 ex-offenders in a development in Crouch End (offenders who are Priority and Prolific Offenders)
2. Floating support across the borough for 8 ex-offenders in their own accommodation (offenders who are under MAPPA)
3. A scheme which is currently being decommissioned and will be remodelled which has up to 45 bed spaces in supported accommodation across the borough for ex-offenders. There were originally 45 places for ex offenders, 18 places for drug and alcohol users, but the remodelling is blurring the line between these, as so many drug and alcohol users are ex offenders and vice versa. The aim is for this service to pick up referrals from the Drug Intervention Programme and Drug and Alcohol Team. .

The Home Office limit for ex-offenders released into Haringey per year is 40. But anecdotally, there are always more than this. Supply should, in theory, meet demand in Haringey. Ex offenders are often released into boroughs away from where they were living / committing crime before they were sentenced.

There is a pilot North London resettlement project going on with Holloway prison. Prisoners are moved to a 'resettlement' wing before they are released, and as part of the process go before a multi-agency panel to manage their rehabilitation into the community. However, so far nobody from this scheme has gone into supported housing.

Single men who are perpetrators of domestic violence may find themselves homeless if they are evicted from their homes because of this. It is not known at present if this is an issue, or the extent of it, in Haringey. At present, temporary accommodation figures show that it is more likely that victims of DV in Haringey leave their homes than perpetrators. However, the possibility of a partner becoming homeless can make female victims reluctant to assist authorities in removing perpetrators, thus perpetuating a DV cycle in the home. Actions will be taken to address how families can remain in their homes, if appropriate – see action 9 of the Homelessness Action Plan regarding Sanctuary Schemes and further research into DV in Haringey.

WOMEN

Although single men are over-represented in temporary accommodation figures, overall, women are over-represented in terms of those who access temporary accommodation as a result of a housing need. As at 23 June 2008, 7,081 people in temporary accommodation in Haringey were male and 8,787 were female, as opposed to the overall Haringey ration of men to women, which is 50:50. Women are consistently over-represented in homelessness figures, reflecting the national picture. Nationally, women, particularly those with children, are likely to earn less money that men, affecting their ability to access housing, particularly private housing.

Reasons for this over representation include:
1) women are more likely to become homeless following pregnancy or the birth of a child (see ethnicity data below)
2) women are more likely to have to leave their home due to domestic violence

Domestic Violence

There is currently no reliable data on the number of women who are homeless in Haringey due to domestic violence. As such, this will be recommended for future monitoring as one of the actions arising as a result of this Equality Impact Assessment. This is a recognised gap. However, domestic violence accounts for about 12% of homelessness acceptance nationally, and around 30% of domestic violence starts during pregnancy. The data below provides details of how domestic violence affects women in Haringey.

Cases of Domestic Violence in Haringey are dealt with by the Hearthstone service. Data providing details of the victims assisted during 2007-08 is given below:

- Hearthstone received 1263 approaches last year – of these, 1238 were from women and 25 were from men.
- Gender: the majority of people who approached Hearthstone were young women – 452 were between 20 and 29, and 383 between 30 and 39. However, significant numbers were both younger and older, demonstrating that DV affects all age groups.
- Ethnicity: The main ethnic groups using the service last year were: Black Caribbean – 270; White British – 218; African – 177; White (other European) – 106 and Mixed Caribbean – 75.
- 2007-08 monitoring data suggests that substance misuse and mental health issues affect a significant number of DV survivors. 379 service users reported using drugs and/or alcohol, and 205 reported having a mental health issue. 39 service users reported having a disability.

Haringey has in place a Sanctuary Scheme which provides the opportunity for survivors of DV to remain in their own homes by providing a range of safety measures. This is offered to all women, irrespective of tenure, who want to remain in their own homes. The number of installations has increased year on year since 2005 when the scheme started, and a target of 80 installations was set for 2008/09.

The ethnicity of those who have had Sanctuary schemes installed is as follows:

Ethnicity	Number
White British	18
Irish	3
Turkish	4
Greek	1
Kosovan /Albanian	1
Pakistani	1
Iranian	2
Black Caribbean	12
Black African	7
Not known	2
TOTAL	51

Sexuality

Whilst our data volume for this equalities strand has improved dramatically, there is still too little data here to make any meaningful analysis.

OLD TOP 4115*

sexuality	applicants	pct
Heterosexual	177	4.3%
Bisexual	1	0.0%
Lesbian	0	0.0%
Gay	0	0.0%
No response	3946	95.7%
TOTAL	**4124**	

NEW TOP 4115 (i.e. bands A&B)

sexuality	applicants	Pct	change
Heterosexual	230	5.6%	+1.3%
Bisexual	1	0.0%	+0.0%
Lesbian	0	0.0%	+0.0%
Gay	0	0.0%	+0.0%
No response	3884	94.4%	-1.3%
TOTAL	**4115**		

OLD BOTTOM 15867*

sexuality	applicants	Pct
Heterosexual	563	13.7%
Bisexual	3	0.1%
Lesbian	1	0.0%
Gay	3	0.1%
No response	15288	370.7%
TOTAL	**15858**	

NEW BOTTOM 15867 (i.e. bands C or lower)

sexuality	applicants	pct	change
Heterosexual	510	12.4%	-1.3%
Bisexual	3	0.1%	+0.0%
Lesbian	1	0.0%	+0.0%
Gay	3	0.1%	+0.0%
No response	15350	373.0%	+2.3%
TOTAL	**15867**		

At present there is a recognised gap in the recording and monitoring of housing applicants' sexual orientation. This situation is common in local authorities, and not specific to Haringey. It is therefore not possible to assess whether lesbians, gay men, bisexuals or

transsexual people access housing services in line with numbers in the general population. However, we can conjecture, though, that young gay people are more likely than young straight people to be rejected by their families because of their sexuality, leaving them at risk of homelessness.

We can also conjecture that young gay people are more likely to suffer from discrimination and bullying at school, making them more likely to leave school early or attain lower grades – which in turn may leave them with a lower income, and at greater risk of homelessness. However, we can also speculate that young gay people are also less likely to become pregnant or to be single parents – so in this way, are less likely than young straight people to become homeless and in need of housing.

There is no evidence that a person's sexual orientation will negatively affect the quality of the service they receive. The EIA acknowledges that the type of service someone gets may be affected by equality issues such as sexual orientation ie in cases of homophobic harassment, abuse or domestic violence.

A 2005 survey returned by 800 gay and lesbian people and funded by the Economic and Social Research Council found that one third of respondents reported being victims of domestic abuse either in their current relationship of in a previous same sex relationship.

Slightly more women than men had experienced abuse, but the difference was not large. The most common form of abuse reported was emotional, however male perpetrators were also likely to be physically and sexually abusive. Victims were more likely to be under 35, have a low income and few qualifications. (Comparing Love and Domestic Violence in Heterosexual and Same Sex Relationships – Dr Catherine Donovan, University of Sunderland, 2005-06. RES-000-23-0650)

We know very little about sexuality and housing need in Haringey but Stonewall Housing's 'Sexual Exclusion' Report (2005) identifies specific homelessness issues faced by lesbian, gay and bisexual people nationally:

Young LGBT people:

Sexuality can be a direct cause of homelessness for young LGB people - they can be thrown out of their home or decide to leave home to escape homophobia. Coming to terms with their sexuality and the withdrawal of support from family can lead to emotional or mental health difficulties, such as low self-esteem, depression and self-harming behavior. They can put themselves in dangerous or exploitative situations to meet their need for acceptance and affection and they can begin to use alcohol or drugs to try to cope with or block out issues arising from being LGB and homeless.

Harassment and violence:

Many LGB people of all ages experience homophobic harassment and violence in their neighborhood. Harassment can cause people to be too frightened to leave their own home, or may lead to homelessness as the neighborhood can become unbearable to live in.

Domestic abuse:

LGBT people can face domestic abuse from partners, parents, siblings and other family members. This abuse can be emotional, physical, financial or sexual. One of the biggest obstacles for LGBT people wanting to flee domestic abuse is the lack of emergency accommodation for LGBT people, especially for men.

Reasons for being a priority group:

Further data needs to be collected and monitored before an assessment of a more comprehensive assessment of any relationship between sexuality and housing need can be undertaken.

Step 3 - Assessment of Impact

Using the information you have gathered and analysed in step 2, you should assess whether and how the proposal you are putting forward will affect existing barriers and what actions you will take to address any potential negative effects*.*

3 a) How will your proposal affect existing barriers? (Please tick below as appropriate)

Increase barriers?	Reduce barriers?	No change? Y

Comment

The proposed new Allocations Policy will produce a system that applicants can understand and which is both fair and transparent. This will be achieved through:

- Comprehensive feedback on the homes that have been let. This information will be obtained from our computer systems.
- Adoption of a common housing needs band structure.
- Detailed procedures for needs assessment and allocations.

The new policy will assist applicants in the highest housing need. All applicants will have their housing needs assessed and placed in a housing needs band according to their circumstances. This will take into account the reasonable preference criteria detailed in the Hosing Act 1996 (as amended by the Homelessness Act 2002).

Homes will be generally let to the applicant in the highest housing need, who has been waiting the longest, having expressed an interest in the home and meeting the criteria advertised.

A system of auto – bidding, together with the provision of comprehensive advice on housing options will markedly reduce the time applicants will have to stay in temporary accommodation.

Vulnerable people will be appropriately supported to access the Housing Allocations Scheme. A number of measures will be taken to ensure this client group in not disadvantaged by:

- Providing appropriate advice and assistance.
- Translating documents on request.
- Providing information in other formats on request.
- Partnership working with support agencies.
- Monitoring system to ensure that vulnerable people are successfully using the scheme.

A comprehensive housing options service will be provided to work alongside the new Allocations policy in order to increase the housing opportunities for all. These options will include affordable home ownership, private rented accommodation and mutual exchanges.

The Allocations Scheme will also ensure that the Council and its partner organisations make best use of homes, in particular adapted properties preference for which will be given to households in need of that adaptation.

3 b) What specific actions are you proposing in order to respond to the existing barriers and imbalances you have identified in Step 2?

The imbalances identified are addressed in the Homelessness Strategy which makes the following proposals:

Strategic Priority One – Actively support and promote a partnership approach to tackling homelessness.

Action 3 Develop protocols for referrals, joint working and information sharing.

Action 4 Review the roles responsibilities and access arrangements of advice   support and accommodation providers.

Strategic Priority Two – Invest in early intervention and effective homelessness prevention.

Action 9   Improve procedures for dealing with hospital discharge, prison leavers and care leavers in order to improve planned move on and the prevention of homelessness.

Action 10   Actively promote the take up of the Sanctuary Scheme which offers the victims of domestic violence the option of remaining in their homes.

Action 15 Devise better ways of engaging with households in order to prevent homelessness and encourage the take up of housing options.

Action 16   Develop and promote a range of services and interventions for young people (including mediation), supported lodgings and mentoring), to prevent homelessness and sustain tenancies.

Strategic Priority Three – Increase the supply of affordable homes.

Action 18   Set up a rent deposit scheme for homeless people deemed by the Council not to be in "priority need".

Action 19   Make it easier for low income households to access the private rented sector and maximise the Council's nomination rights to the private rented sector.

Action 23   Make best use of local supported housing.

Strategic Priority Four – Provide Choice and encourage independence.

Action 28 Ensure that the decent homes investment creates local training and employment opportunities that support Haringey's plans to tackle worklessness amongst homeless households.

Strategic Priority Seven – Work proactively to safeguard children and vulnerable adults.

Action 47   Adopt a shared strategic approach to the provision of housing and support for homeless children, young people, and vulnerable adults.

Action 49 Make recommendations to improve early intervention, support and housing options for disabled people (including children) their carers and families and remove barriers to accessing services.

Action 49 – Undertake research to understand the reasons why single men become homeless (particularly ex-offenders and young men) and establish the housing and support needs.

3 c) If there are barriers that cannot be removed, what groups will be most affected and what Positive Actions are you proposing in order to reduce the adverse impact on those groups?

We will be advising all applicants affected by the introduction of the new Allocations Policy of the change by letter. A copy of this letter will be sent to any Homes For Haringey tenant on the Housing Register in order that they are able to assist with any queries, in addition to Council staff.

Information about the changes will be widely publicised and will include publicity in local council offices and on the webpage.

Applicants in Bands A and B will be informed of their band placement in the above mentioned letter.

Applicants in Band C – E will be given details of their indicative band placement which will be confirmed or revised as necessary on completion of re – registration and assessment of

their circumstances. This letter will also advise of three choices for the completion of the re-registration form :

- **Use of the online application form via the Council's website**: applicants will be provided with the required details for this (including a secure PIN) and will be able to use public access computers in Council buildings for this purpose. The form will be available in community languages, and written guidance and support will be provided by local staff.

- **In person, by appointment, at designated Council offices**: applicants will be helped to complete the online application form. At Apex House, opening hours will be extended (to include evenings and weekends) to assist applicants who cannot attend during the day. Interpreters will be arranged as required.

- **At home, by appointment**: applicants whose mobility is restricted and who cannot attend an interview at one of the Council's offices will be visited at home by a member of staff who will help them complete the form. Interpreters will be arranged as required.

All correspondence will be in the appropriate language (where we have this information) or will be translated on request. In addition to the initial letter requiring re-registration, applicants will receive two reminders. Regular use will be made of Council publications and the website to advertise the re-registration exercise. An extensive communications plan has been developed to ensure that stakeholders and partners are informed and that they are able to help applicants to successfully complete the re-registration process.

All applicants have the right of review if they believe they have been placed in the incorrect band.

The proposed methodology for implementation of the new Allocations policy, data collection, monitoring and analysis should assist in reducing access to housing services amongst all groups. This is because monitoring information will be reviewed in order to consider what further assistance can be provided to those seeking housing services. Details and timescales of these are contained within the Action Plan.

Step 4 - Consult on the proposal

Consultation is an essential part of impact assessment. If there has been recent consultation which has highlighted the issues you have identified in Steps 2 and 3, use it to inform your assessment. If there has been no consultation relating to the issues, then you may have to carry out consultation to assist your assessment.

Make sure you reach all those who are likely to be affected by the proposal, ensuring that you cover all the equalities strands. Do not forget to give feedback to the people you have consulted, stating how you have responded to the issues and concerns they have raised.

4 a) Who have you consulted on your proposal and what were the main issues and concerns from the consultation?

The proposed banding structure of the new policy was discussed with Members at the Leader's Conference Oct 2009. The move to a 5 band structure was agreed, so the remit of the consultation focussed on the eligibility criteria included in each band.

The consultation period was from 21st June to 1st October 2010.

The consultation process followed Haringey's consultation framework and the Haringey Compact to ensure inclusion and equality.

Consultation activity

The consultation provided wide and varied opportunities for people affected by the change to Haringey's Allocations Policy to ask questions and give feedback during the consultation.

It included all councillors, partners such as Registered Providers; Homes for Haringey; Registered Providers; housing support providers and their service users; voluntary sector organisations; equality groups and community groups and the general public

A range of mediums appropriate to the audience were arranged and ensured that as many stakeholders as possible were involved. These included:
* Newspapers – Haringey People, Homezone (Homes for Haringey tenant's newsletter), staff newsletters; Forum for Older People newsletter, special edition of Moving on magazine sent to everyone living in temporary accommodation and local press
* Haringey's website
* Presentations at Boards e.g. Integrated Housing Board, Supporting People Partnership Board, Transforming Social care Board
* Discussion at Forums e.g. temporary accommodation user forum, Area Assemblies, Haringey Policy Network
* Workshops with supported housing service users; community and voluntary groups
* Consultation meetings with Elected Members
* Specific half day event which Council Officers, stakeholders and consultative groups were invited to
* Stands at Customer Service Centres and Wood Green Shopping City
* Meetings with Haringey Council Staff

Appendix 1 list the events held

Activity	Number
Number of events held	47
People directly spoken to about policy	Approx 1300
Number of people in TA received Moving on magazine	3,500
Number of HfH tenants receiving Homezone (HfH newsletter)	20,000
Emails received	31
Telephone calls – Calls received by customer service centre Calls passed to S&CHS	Approx 10 Approx 12

Feedback received from consultation

Feedback was received through a variety of methods including emails, phone calls but the majority was captured during discussion at events and meetings.

We did receive some emails and some discussion at events centred on individuals wanting to know how the new policy will affect them. We made it clear that we were unable to respond to this through the consultation process but when we undertake re-registration this will be dealt with.

All of the comments received have been collated and considered.

As a result of this consultation, some minor revisions have been made to some of the text within the draft Allocations Policy.

In addition to this, changes have been made to the Bands, details of which are specified below.

The revised proposed Bands are as follows;

HOUSING NEEDS BAND 'A'

1.   Applicants who need to move urgently because of a critical medical or welfare need, including emergencies.

2.   Applicants who, at the discretion of the Council, need to move urgently because there are serious safeguarding circumstances. Included as a separate point. Originally part of point 1 above.

3.   Tenants of the Council or of partner housing associations who have been approved for an emergency management transfer because of harassment, domestic violence or hate crime, including cases agreed through reciprocal arrangements with other local authorities. Revised to include.

4.   Haringey Council tenants and partner housing association tenants living in Haringey who are under-occupying a family home (with three or more bedrooms) and are willing to transfer to a home that has at least two fewer bedrooms. Revised to include.

5.   Haringey Council tenants and partner housing association tenants living in Haringey who are under-occupying a two-bedroom family home and are willing to transfer to a bedsit or one-bedroom home. Revised to include.

6.   Haringey Council tenants and partner housing association tenants living in Haringey who are occupying a specially-adapted home and are willing to transfer to a home that is more appropriate to their needs. Revised to include.

7.   Applicants who have a right of succession to a Council tenancy but are under-occupying their accommodation (or occupying a specially-adapted home) and are required to move to somewhere smaller and/or more appropriate to their needs.

8.   Haringey Council tenants and partner housing association tenants living in Haringey who require extensive disabled facilities that can be provided more appropriately in alternative accommodation. Revised to include.

9.   Applicants who are in severe need and have been accepted for rehousing, by Haringey Council, under the homelessness legislation.

10. Haringey Council tenants and partner housing association tenants living in Haringey who need to be permanently decanted in order to enable essential repairs or redevelopment to be carried out, or as part of a regeneration scheme in Haringey. Revised to include.

11. Applicants who are required to leave their homes as a result of an prohibition order served by the Council or the Fire Service in relation to the premises.

12. Applicants (including young care leavers and people leaving hospital, residential care and supported housing) who are nominated for move-on accommodation by named agencies in accordance with an agreed nominations agreement that includes specific quotas.

13. Retiring service tenants who are living in Council accommodation and for whom Haringey Council has a contractual obligation to provide accommodation.

14. Situations where it is in the overriding interests of the Council to prioritise an allocation of housing to a particular household and/or it is necessary to fulfil an urgent statutory or legal duty.

15. Applicants (except homeless households for whom the Council has accepted a rehousing duty) who have two or more needs in Band B.

Note: Applicants assessed as meeting Housing Needs Band A criteria but with no local connection with Haringey will be placed in Band C, except in those cases of emergency management transfer through reciprocal arrangements with other local authorities. Revised from Band A to C and additional information included.

HOUSING NEEDS BAND 'B'

1. Applicants who need to move because they have been assessed as having a serious medical or welfare need.

2. Haringey Council tenants and partner housing association tenants living in Haringey who are severely overcrowded and have at least two rooms <u>less</u> than the number of rooms to which they would be entitled to under Haringey's Housing Allocations Policy. This includes reception rooms that could reasonably be used as bedrooms. Revised to include.

3. Adult (aged over 25) members of the households of Council and partner housing association tenants living in Haringey who require single person accommodation, and are severely overcrowded and have at least two rooms less than the number of rooms to which they would be entitled under Haringey's Allocations Policy. This includes reception rooms that could reasonably be used as bedrooms. New point.

4. Applicants for whom Haringey Council has accepted a full rehousing duty under the homelessness legislation.

5. Applicants who need to move to a particular locality in the Borough, where failure to meet that need would cause hardship to themselves or to others.

6. Applicants living in accommodation for which an improvement notice has been served, or is about to be served, by Haringey Council in relation to the applicant's dwelling and the Council has determined that the dwelling must be vacated because the remedies that are needed to reduce the hazard will require the property to be vacated for a significant period of time or will make the property unsuitable for occupation by the applicant. New point.

7. Applicants with 4 or more needs in Housing Needs Band C.

Note: Applicants assessed as meeting Housing Needs Band B criteria but with no local connection with Haringey will be placed in Band D. They will have a lower relative priority than those applicants in Band D who do have a local connection, regardless of those applicants having later 'effective dates'. Revised from Band C to D and additional information included.

HOUSING NEEDS BAND 'C'

1. Applicants who need to move because they have been assessed as having a moderate medical or welfare need.

2. Haringey Council tenants and partner housing association tenants living in Haringey who are overcrowded because they have one bedroom less than the number of bedrooms to which they would normally be entitled under Haringey's Housing Allocations Policy. Revised to include.

3. Applicants who are homeless or threatened with homelessness but have been assessed by the Council within the previous 12 months as having no right to rehousing under the homelessness legislation because they are not in priority need. Revised to include.

4. Applicants who are homeless or threatened with homelessness but have been assessed within the previous twelve months by the Council as having no right to rehousing under the homelessness legislation because they are considered to have become homeless intentionally, and have not been resident in settled accommodation. Revised to include. Originally part of point 3 above.

5. Applicants who have no fixed abode.

6. Applicants who the Council has placed in specialist or supported accommodation, or applicants (including young care leavers and people leaving hospital, residential care and supported housing), and require move-on from that accommodation. Revised to include.

7. Protected tenants and tenants of tied accommodation who have been served with a valid notice to quit and the Council is satisfied that they have little or no prospect of successfully defending the possession proceedings.

8. Applicants who are severely overcrowded and living in private rented (including non-partner housing association) accommodation in Haringey. Revised to include.

9. Applicants living in accommodation for which a hazard awareness notice has been served, by Haringey Council in relation to a Category 1 or 2 hazard in the applicant's dwelling and the remedies needed to reduce the hazard will require the property to be vacated for a significant period of time or will make the property unsuitable for occupation by the applicant.

10. Council tenants and partner housing association tenants in Haringey who are under-occupying a family home (with three or more bedrooms) and are willing to transfer to a home that has at least one fewer bedroom. New point.

   Note: Applicants assessed as meeting Housing Needs Band C criteria but with no local connection with Haringey will be placed in Band D. They will have a lower relative priority than those applicants in Band D who do have a local connection, regardless of those applicants having later 'effective dates'. Revised to include.

HOUSING NEEDS BAND 'D'

1. Applicants who have an identified housing need but are awarded 'reduced preference' under the law.

2. Applicants who are overcrowded and living in private rented accommodation in Haringey. New point.

3. Applicants who are tenants of a non-partner housing association (whose housing is not subject to a tenancy nominations agreement with Haringey Council), are overcrowded and have a local connection with Haringey. New point.

4. Applicants living in accommodation lacking permanent facilities or sharing facilities with others not included on their application. New point.

   Note: Applicants assessed as meeting Housing Needs Band D criteria but with no local connection with Haringey will be placed in Band E. They will have a lower relative priority than those applicants in Band E who have been relegated from Band D because they do not have a local connection, regardless of those applicants having later 'effective dates'. Revised to include this footnote.

HOUSING NEEDS BAND 'E'

1. Applicants who are living in tied accommodation, a caravan or mobile home, but with no identified housing need.

2. Applicants who live in a property that is adequate to meet their needs in terms of property type, size and facilities.

3. Applicants who are in prison.

4. Applicants whose homes are (or will be) the subject of a hazard awareness notice or improvement notice, but the specified remedies are low-cost and straightforward to achieve.

5. Applicants who are owner-occupiers (but see Section 5.9).

6. Applicants who are overcrowded and living in private rented accommodation outside Haringey. New point.

   Note: Applicants assessed as meeting Housing Needs Band E criteria but with no local connection with Haringey will be placed in Band E. They will have a lower relative priority than those applicants in Band E who have a local connection, regardless of those applicants having later 'effective dates'. Revised to include this footnote.

Overall the feedback has been very positive. The Banding system is recognised as being fair and transparent and considerably less complex than the previous 48 groups of points. It also addresses priority issues such as under - occupation, overcrowding and move-on from short term accommodation which was welcomed.

The majority of feedback related to
- Local connection
- Move-on through the non-priority rent deposit scheme
- Definition of 'vulnerable' needs to be clear
- Auto -bidding
- Need for clear procedures

Besides specific queries raised against individual points in the policy, the issue that concerned most people was how the new policy will be implemented and the problems that this may raise. This included: English not being the first language, lack of IT skills to complete e-registration, the time it may take vulnerable people to reregister.

In response to this we are developing a communication and training plan for internal and external stakeholders, including staff to ensure that the move to the new system is as smooth as possible

A summary of the outcome of the consultation including the nature of the feedback received and what the Council's will be doing in response to this will be placed on the Council's website by 7 November 2010.

The issues you have identified during the assessment and consultation may be new to you or your staff, which means you will need to raise awareness of them among your staff, which may even training. You should identify those issues and plan how and when you will raise them with your staff.

Do you envisage the need to train staff or raise awareness of the issues arising from any aspects of your proposal and as a result of the impact assessment, and if so, what plans have you made?

1.   Background

The consultation has now finished for the draft Allocations Plan and we are entering the implementation phase. Subject to Cabinet approval on 16th November the Policy will come into effect in January 2011.

The consultation was successful and a number of key points were raised in relation to implementation. This plan addresses these.

2.   Aim of Communications Plan

The aim of this Plan is to ensure that the implementation and longer term Allocation Policy is successful and that all stakeholders and general public are aware of the changes; how it may affect them and their role in implementation.

3.   Communications Plan

In response to feedback this Plan is wider than just communicating about the changes. We have identified 3 strands
1.   Communications
2.   Awareness and education
3.   Working processes and procedures

The action plan is therefore divided into these 3 sections.

We have identified which stakeholders we need to include in the Communications Plan and the methods to do so.
This plan covers two aspects of implementation –
1.   What do we need to do short-term i.e. to re-register everyone on housing list
2.   New registrations – there will be a period of time (say Jan to April when re-registration and new registration will be running in tandem

4.   Timescale

This Communications Plan runs from October 2010 to April 2011. The majority of the work will need to be undertaken within the first 3 months.

We will be identifying those households in Bands A and B writing to them in December informing them that we are moving to the new Policy and that based on their current circumstances they have been placed in one of these Bands.

From January we will be writing to all the remaining households inviting them to re-register. They will have until 31.3.11 to do so.

Communications

Action	Who Responsible	Timescale	RAG Status	Comment
Consultation report for public written and put on web	Rosie Green/ Clare Leahy	7.11.10		
Final Policy to be proof read, designed and PDF	CL	17.11.10		
Leaflets – 1. Produce leaflet for those already on housing register identified in Bands C-E telling them what they need to do 2. Produce general leaflet on Allocation Policy – to be sent with letter to people in Bands A&B and for new registrations	CL/Bev Faulkner	31.12.10 30.11.10		
Produce posters and distribute to CSC, Libraries etc	CL	30.11.10		
Review all existing publications Reprint if required	CL	20.1110 31.12.10		
Review Web pages and update for each milestone • upload new Policy • amend webpages to reflect new Policy and process • upload revised FAQ	CL	 17.11.10 19.11.10 30.11.10		
Website – needs to hold re-registration link and form	Project team/ CL	Mid Jan 11		

Action	Who Responsible	Timescale	RAG Status	Comment
Website – needs to hold re-registration link and form	Project team/ CL	Mid Jan 11		
Press release for re-registration	Project team/ CL	Week before letter goes out (poss mid Jan)		
Article in Haringey People	CL	Jan 11 (but will need to be with Corp Comms 2 months before)		
FAQ's need to be re-written	Project team/ CL	30.11.10		
Letter to households in Bands A and B	Project team/ CL	10.12.10		
Letter to remainder of people on current register	Project team/ CL	06.01.11		
Reminder letters x 2 (need to agree dates they will be sent)	Project team/ CL	31.01.11		
Members information pack - briefing note about re-registration process and timetable - Policy - Copy of all letters and leaflets sent out - Case studies	Project team/ CL	10.12.10		
Stakeholders information pack – might need to amend for different groups FAQ's about re-registration process and timetable	Project team/ CL	30.11.10		

Action	Who Responsible	Timescale	RAG Status	Comment
• Policy • Copy of all letters and leaflets sent out • Case studies				

Awareness / Education

Action	Who Responsible	Timescale	RAG Status	Comment
Identify stakeholders	RG/Ferzana Ali	11.10.10	Green	
Members Event 1. Agree Date 2. Develop Programme 3. Do Members Pack 4. Agree who is presenting and facilitating group work	Mustafa Ibrahim/ Phil Harris/Zulfiqar Mulak/Project Team/George Peradigou	16.12.10	Green	
Develop plan and get agreement for using Council facilities for registration – libraries, service centres, Housing Options reception	Project Team	20.12.10		
Develop stakeholders training/awareness plan – This will consist of series of workshops to talk through process of registration and how each stakeholder is involved. When complete we need to put names to dates as this will need to be shared between Project team and who else they identify Suggest we identify 1 week to do this in Need to include • Adult Social Care • Children's Services • Legal Services • Customer Services Staff	Project Team	To be completed before letter goes out to people in Bands A and B – 10.12.10 1-8.12.10		

Action	Who Responsible	Timescale	RAG Status	Comment
• Libraries Staff • Housing Providers • Housing Support Providers • HfH Stakeholders to be given an information pack				
Meet with Customer Services Staff over phone calls/visits which are likely to be received after Band A and B letters and then general re-registration letters go out.	MI/BF	30.11.10		
Agree who will be responsible for answering queries within S&CHS	MI/BF	20.11.10		

Step 6 - Monitoring Arrangements

If the proposal is adopted there is a legal duty to monitor and publish its actual effects on people. Monitoring should cover all the six equality strands. The purpose of equalities monitoring is to see how the policy is working in practice and to identify if and where it is producing disproportionate adverse effects and to take steps to address the effects. You should use the Council's equal opportunities monitoring form which can be downloaded from Harinet. Generally, equalities monitoring data should be gathered, analysed and report quarterly, in the first instance to your DMT and then to the Equalities Team.

What arrangements do you have or will put in place to monitor, report, publish and disseminate information on how your proposal is working and whether or not it is producing the intended equalities outcomes?

▪ *Who will be responsible for monitoring?*

Assessment and Lettings Manager

▪ *What indicators and targets will be used to monitor and evaluate the effectiveness of the policy/service/function and its equalities impact?*

1. Monthly report for each equalities strand on:

The total number of Housing Register applicants in each Band (within in each sub category) at the end of the month.

The number of applicants re - housed from each Band (from which sub category) during that month. Effective date of re-housed applicants and whether or not re-

housing was as a result of self bidding or inclusion within the Auto-bidding scheme.

The number of new Housing Register applications received during that month together with details of:

Decision made and Band placement awarded.

The number of existing Housing Registration applications closed and reasons for closure (no response to review, no longer eligible due to unacceptable behaviour).

Number of Housing Registration applications suspended and reasons for this.

Number of reviews submitted and outcomes.

2. Further EIA 3 months after policy implementation.

3. Three month post implementation review of policy and EIA results.

Note :Equalities profile data will be included in all the above where it is available. This will assist the service to identify any issues of non, under or over representation.

- *Are there monitoring procedures already in place which will generate this information?*

Yes. Existing procedures and monitoring data will be revised to produce the new monitoring data.

- *Where will this information be reported and how often?*

Monthly to Housing Needs Management team and quarterly to the Senior Management team.

Step 7 - Summarise impacts identified

In the table below, summarise for each diversity strand the impacts you have identified in your assessment

Age	Disability	Ethnicity	Gender	Religion or Belief	Sexual Orientation
No change from points to Band based Allocations system.	No change from points to Band based Allocations system.	No change from points to Band based Allocations system.	No change from points to Band based Allocations system.	No change from points to Band based Allocations system.	No change from points to Band based Allocations system.
Young people are a priority group for the Homelessness Strategy. Recommendations include better integration of homelessness services, with increased emphasis on early intervention and prevention services.	There is currently insufficient data regarding disable people. Further investigation is proposed into categories of disability amongst applicants in housing need.	Race is identified in the Homelessness Strategy as a major factor in homelessness and housing need in Haringey. Black African and Black Caribbean groups are identified as priority and reasons for homelessness amongst these groups identified.	Single men and women are identified as priority within the homelessness strategy. Particularly identified are young single female parents and women made homeless through domestic violence.	Religion has not been identified as a major barrier to accessing housing services. However, this assessment recognises that ethnicity and religion are often closely related. Groups with high levels of homelessness such as Black African and Caribbean people are nationally more likely to be Christian or Muslim so places of worship should be used to target these groups	This assessment recognises that there is currently insufficient data to assess whether lesbian, gay, bisexual, or transsexual groups are over represented amongst those in housing need. There is currently no evidence to suggest that a person's sexuality will influence there aces to housing provision.

Step 8 - Summarise the actions to be implemented

Please list below any recommendations for action that you plan to take as a result of this impact assessment.

Issue	Action required	Lead person	Timescale	Resource implications
Change from points to Bands	Notify applicants in Bands A& B, by letter, of band placement. Ensure that they are properly informed of the changes and who to contact if they need advice. Notify applicants in Band C-E of their indicative bands and ask them to re-register either on line, in person where staff will provide assistance or by home visit in the case of applicants with mobility constraints. Ensure that they are properly informed of the changes and who to contact if they need advice. Provide all	Beverley Faulkner	By mid of December 2010 As above By mid December 2010 By mid December 2010	All actions to be undertaken by existing staff resources.

	correspondence in appropriate languages.

Providing appropriate information and training to all stakeholders to ensure they are fully informed of changes and can assist our applicants. | | By mid December 2010 | |
| **Housing Register Data** | In relation to main all applicants on the housing register. This data should be broken down by - :

- Age
- Gender
- Disability
- Sexual orientation
- Ethnicity
- Religion
- Bed size requirements
- Effective date at time of successful bid.
- Auto bid case and effective date.

The above data should be obtained and reviewed 3 months from the implementation of policy in addition to – : | Beverley Faulkner | From implementation

April 2011 | |

	-The number of applicants re - housed from each Band (from which sub category), with details of area and bedsize of property accepted. - The number of property refusals, by bedsize and area. The number of new Housing Register applications received together with details of: • Decision made and Band placement awarded. • Number of Housing Registration applications suspended and reasons for this. • Number of reviews submitted and outcomes. - The number of existing Housing Registration			

			April 2011	
	applications ; • closed and reasons for closure. • Number of reviews submitted and outcomes - At the end of re-registration period: The number of households who fail to re-register within the re-registration period, by geography and equalities group if possible. At the end of re-registration period **Equalities profile data to be included where possible in order to identify any issues of over- representation**			

Step 9 - Publication and sign off

There is a legal duty to publish the results of impact assessments. The reason is not simply to comply with the law but also to make the whole process and its outcome transparent and have a wider community ownership. You should summarise the results of the assessment and intended actions and publish them. You should consider in what formats you will publish in order to ensure that you reach all sections of the community.

When and where do you intend to publish the results of your assessment, and in what formats?

December 2010 on the Councils Website. PDF format

Assessed by (Author of the proposal):

Name: Ferzana Ali

Designation: Project Officer

Signature: Ferzana Ali

Date: 05 November 2010

Quality checked by (Equality Team):

Name: Christine A Joseph

Designation: Equality and diversity officer

Signature: Christine A Joseph

Date: 11 November 2010.