Public Document Pack



ADVANCED PUBLICATION OF REPORTS

This publication gives five clear working days' notice of the decisions listed below.

These decisions are due to be signed by individual Cabinet Members and operational key decision makers.

Once signed all decisions will be published on the Council's Publication of Decisions List.

1. ENTERING INTO AGREEMENT WITH NORTH LONDON MUSLIM HOUSING ASSOCIATION TO PROVIDE A MIX OF 19 DWELLINGS FOR AFFORDABLE RENT. (Pages 1 - 22) This page is intentionally left blank

Please note Part 2 report is now confidential appendix.

London Borough of Enfield

Operational Report

Report of Joanne Drew

Subject: Entering into agreement with North London Muslim Housing Association to provide a mix of 19 dwellings for affordable rent.

Executive Director:	Sarah Cary		
Ward	Ponders End		
Key Decision:	KD5003		

Purpose of Report

- 1. The Council has set aside unspent Right to Buy receipts for new supply, including ringfenced funding allocation to support delivery of sites owned and managed by Registered Providers.
- 2. This report recommends the Council awards £1,102,169.01 of grant funding (being no more than 40% of the total scheme costs) to North London Muslim Housing Association and enters into an agreement with them on the terms of its use and on the respective roles and responsibilities of each party.

Proposal(s)

- 3. It is recommended that the Executive Director Place in consultation with the Executive Director Resources:
 - a. Approve the award of £1,102,169.01 Right to Buy grant funding to North London Muslim Housing Association, (NLMHA) to part fund development of nineteen dwellings for London affordable rent.
 - b. Agree to enter into a grant funding agreement with NLMHA and delegate completion of relevant approvals to the Director for Housing and Regeneration.

Reason for Proposal(s)

4. The original bid was approved in principle in 2019 as part of a programme to support small housing associations to deliver new homes in the borough using unspent Right to Buy receipts. By negotiation it was agreed that

NLMHA would acquire new homes at Electric Quarter and convert these to London Affordable Rent for the Council to nominate tenants to.

- 5. Prior to entering into contract, the Housing Association was required to complete a Deed of Variation which concluded earlier this year. The proposals in this report will support to:
 - Increase the portfolio of affordable rented accommodation in the borough with nominations back to the Council. The homes have already been let to people on the housing needs register, reducing the Council's overall temporary accommodation costs.
 - Assist the Council to discharge its statutory duties on homelessness
 - Ensure the Council retains 100% nomination rights in perpetuity (rather than the standard 75% at second let) to a mix of 19 social rent dwellings
 - Achieve the Council's objectives of committing receipts for replacement homes in line with the Department of Levelling Up Housing and Communities Retention Agreement.

Relevance to the Council's Plan

6. This contract will enable delivery on the priorities of the 2018-2022 Plan, "Creating a lifetime of opportunities in Enfield", by providing good homes in well-connected neighbourhoods.

Background

- 7. The provision of the RTB (Right to Buy) receipts enables NLMHA (North London Muslim Housing Association) to offer the 19 units at Electric Quarter B1 at London Affordable rent levels, thus increasing supply of new homes to meet existing needs. The homes were originally identified as shared ownership but through negotiation the Council has secured more social housing. This variation for this change of tenure was agreed through a S.106 Agreement which was signed on 29th November 2021. The Council has allocated receipts to support the increased number of social housing and proposes to enter into a grant agreement to enable payment to NLMHA for the delivery of 19 additional social rented homes.
- 8. A plan showing the location of the B1 units on the estate is shown in Appendix 1.

Entering Grant Agreement

- 9. Grant awards are provisional, and payment is subject to entering agreement with prospective recipients on the terms of its use and our respective roles and responsibilities.
- 10. Officers have finalised negotiations with NLMHA and recommend the Council enters into an agreement to enable the delivery of 19 new affordable rent properties. In keeping with the provisions for Round two 100% of the grant will be payable to NLMHA on signing the agreement.

Main Considerations for the Council

11. The Council has agreed in principle to support the delivery of 19 homes for London Affordable Rent, subject to contract. By supporting the acquisition, the Council has 19 homes which it has nominated to and are currently let, thus helping to reduce pressures on temporary accommodation.

Safeguarding Implications

12. None

Public Health Implications

13. The affordable housing will work towards alleviating the increasing number of residents who are homeless, rough sleeping or in insecure, poor quality housing which will have a positive impact on public health.

Equalities Impact of the Proposal

- 14. An Equality Impact Assessment has been completed and is appended to this report. As at May 2022 there are no known implications as a result of taking this decision. The decision will create positive opportunities for people on the housing needs register by providing stable, good quality, affordable housing within the Borough.
- 15. The Council will retain 100% of the initial nomination rights and properties will be allocated in accordance with the Council's current procedure. NLMHA has an Equal Opportunities Policy and we are satisfied that the organisation will meet the Public Sector Equality Duty in the on-going management of tenancies.

Environmental and Climate Change Considerations

- 16. The homes have been built in accordance with London Plan requirements which required them to achieve a 35% improvement in total CO2 emissions arising from the operation of the development and its services over Part L of Building Regs 2013. According to the Energy Strategy the proposed development will achieve a 39% improvement.
- 17. The energy demand across the development has been minimised through passive design and energy efficiency measures, and particularly the façade design with appropriate glazing, solar control glazing and a good fabric performance. In addition, the development will also utilise roof space for solar PV and green roof provision, as well as connect to a district heat network.

Risks that may arise if the proposed decision and related work is not taken

18. If the Council does not provide right to buy receipts to NLMHA this will financially impact a small housing association who have been forward funding the development on the basis of the agreement in principle in 2019.

Risks that may arise if the proposed decision is taken and actions that will be taken to manage these risks

- 19. NLMHA could fail to honour the terms of the grant agreement. This risk will be mitigated by ensuring the grant agreement includes a claw back arrangement which will enable LBE to recover grant should NLMHA default on their obligations.
- 20. The Council will monitor NLMHA's adherence to the terms of the grant agreement on an ongoing basis and will seek to recover the grant should the agreement's terms be breached.

Financial Implications

- 21. This report is proposing to allocate RTB receipts to NLMHA to assist them in developing 19 new properties in the Borough.
- 22. The bid total is £1,102,169.01 which will be funded from existing usable RTB receipts and will be paid to NLMHA in 2022-23. 100% grant will be payable to NLMHA on signing the agreement.
- 23. There is currently £18.1m of RTB receipts in the reserves balance sheet, of which £1.1m has been allocated to fund the payment to NLMHA.
- 24. The Council entered into a Retention Agreement with the Secretary of State in 2012, which allows the Council to retain Right to Buy Receipts provided it spends a sufficient level of those receipts on replacement social housing. Subsequently there has been amendments to this agreement since 2012 with the latest agreement entered in 2021.
- 25. The granting of these sums to Registered Providers' means that they are required to match fund the grant sums with a 60% contribution from their own resources. This means that the Council does not have to find the 60% match funding from within the HRA business plan.

Legal Implications

MD 24th May 2022

26. The proposal to advance grant funding to NLMHA is made pursuant to Section 11(6) of the Local Government Act 2003 to facilitate the delivery of an affordable housing scheme. In making the grant available the Council must comply with the Retention Agreement it has entered into with the Secretary of State which permits the Council to retain Right to Buy Receipts provided it spends a sufficient level of those receipts on replacement social housing. The Retention Agreement permits the Council to use its receipts to grant fund another body (such as a registered provider) but places limits on the amount the Council can grant fund (no more than 40% of the total development costs) and the types of costs towards which the grant can be applied.

- 27. The form of grant agreement must be approved in advance of commencement by Legal Services on behalf of the Director of Law and Governance.
- 28. Given the proposed value of the grant, the Council's Key Decision process must be followed.

Workforce Implications

- 29. This report seeks approval to enter into a grant agreement for affordable homes.
- 30. Based on this there are no identifiable workforce implications such as additional or diminished staff or other resource, potential TUPE obligations etc.

Property Implications

31. The grant agreement with NLMHA within the Housing Revenue Account and the property implications have been set out throughout the report. There are no corporate property implications in making this decision.

Other Implications

- 32. Good Homes in Well Connected Neighbourhoods
- 33. Providing NLMHA with RTB receipts will maximise the supply of affordable housing in the Borough, providing more opportunities for people in Enfield to access homes they can afford.
- 34. Sustain Strong and Healthy Communities
- 35. Supporting the acquisition of housing will enable the Council to increase the portfolio of stock it has to discharge its statutory housing responsibility to households that live in the Borough.
- 36. Build our Local Economy to Create a Thriving Place
- 37. Developing good quality housing in areas where people desire to live will help to create and maintain strong sustainable communities and will contribute to the strength the Enfield economy as additional households within an area provide new opportunities for local businesses.

Options Considered

38. The Council could choose to do nothing. If this course of action was adopted the Council would not be able to fulfil its duty to provide affordable housing for rent and utilise this expenditure as agreed.

39. The Council could choose not to offer the right to buy receipts to NLMHA, but this would result in a loss of 19 affordable rent properties to the council's housing waiting list.

Conclusions

40. Approval of this grant to NLMHA will enable the Council to fulfil its duty to provide affordable housing for rent and utilise this expenditure as agreed.

Report Author:	Amena Matin Head of Regeneration and Growth 020 8148 4384

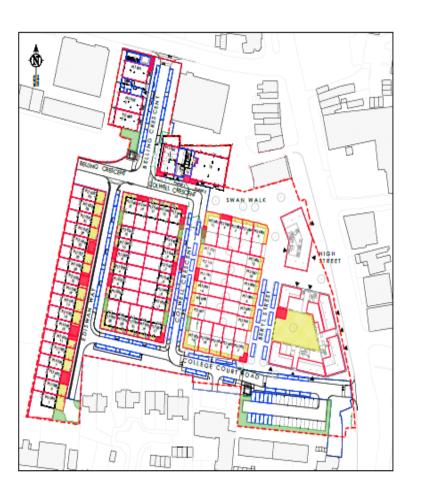
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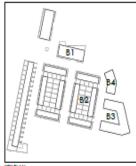
Appendices Appendix 1 - Plan of Estate Appendix 2 – EqIA

Background Papers

The following documents have been relied on in the preparation of this report: None. Page 7

Appendix 1 - Plan of Estate





The contractor shall allow for all materials and work necessary to complete the works as intended whether indicated or not on specifications or drawings.

All dimensions to be checked or site.

This drawing must be read in conjunction with relevant drawings and specification from Architect and other consultants.

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Enfield Equality Impact Assessment (EqIA)

Introduction

The purpose of an Equality Impact Assessment (EqIA) is to help Enfield Council make sure it does not discriminate against service users, residents and staff, and that we promote equality where possible. Completing the assessment is a way to make sure everyone involved in a decision or activity thinks carefully about the likely impact of their work and that we take appropriate action in response to this analysis.

The EqIA provides a way to systematically assess and record the likely equality impact of an activity, policy, strategy, budget change or any other decision.

The assessment helps us to focus on the impact on people who share one of the different nine protected characteristics as defined by the Equality Act 2010 as well as on people who are disadvantaged due to socio-economic factors. The assessment involves anticipating the consequences of the activity or decision on different groups of people and making sure that:

- unlawful discrimination is eliminated
- opportunities for advancing equal opportunities are maximised
- opportunities for fostering good relations are maximised.

The EqIA is carried out by completing this form. To complete it you will need to:

- use local or national research which relates to how the activity/ policy/ strategy/ budget change or decision being made may impact on different people in different ways based on their protected characteristic or socioeconomic status;
- where possible, analyse any equality data we have on the people in Enfield who will be affected eg equality data on service users and/or equality data on the Enfield population;
- refer to the engagement and/ or consultation you have carried out with stakeholders, including the community and/or voluntary and community sector groups you consulted and their views. Consider what this engagement showed us about the likely impact of the activity/ policy/ strategy/ budget change or decision on different groups.

The results of the EqIA should be used to inform the proposal/ recommended decision and changes should be made to the proposal/ recommended decision as a result of the assessment where required. Any ongoing/ future mitigating actions required should be set out in the action plan at the end of the assessment.



Section 1 – Equality analysis details

Title of service activity / policy/ strategy/ budget change/ decision that you are assessing	Grant funding award and contract
Team/ Department	Regeneration
Executive Director	Sarah Cary
Cabinet Member	Cllr George Savva
Author(s) name(s) and contact details	Amena Matin
	Amena.matin@enfield.gov.uk
Committee name and date of decision	Key decision

Date the EqIA was reviewed by the	Yes
Corporate Strategy Service	
Name of Head of Service responsible	Amena Matin
for implementing the EqIA actions (if	
any)	
Name of Director who has approved	Joanne Drew
the EqIA	

The completed EqIA should be included as an appendix to relevant EMT/ Delegated Authority/ Cabinet/ Council reports regarding the service activity/ policy/ strategy/ budget change/ decision. Decision-makers should be confident that a robust EqIA has taken place, that any necessary mitigating action has been taken and that there are robust arrangements in place to ensure any necessary ongoing actions are delivered.

Section 2 – Summary of proposal

Please give a brief summary of the proposed service change / policy/ strategy/ budget change/project plan/ key decision

Please summarise briefly:

What is the proposed decision or change? What are the reasons for the decision or change? What outcomes are you hoping to achieve from this change?



Who will be impacted by the project or change - staff, service users, or the wider community?

The Council is seeking to support the delivery of 19 rented homes through part-funding using Right to Buy (grant) receipts. The grant will be paid to North London Muslim Housing Association who have acquired the newbuild homes from Lovell. The homes will be owned by the Housing Association with 100% nominations to the Council. The grant is to enable the homes to be converted from shared ownership to London Affordable Rent which will make available affordable accommodation to people on the housing needs register.

Enfield's Housing Register is a local register of housing need. All applicants seeking social housing in Enfield 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.

There are two primary routes onto the Housing Register:

- Homeless applicants to whom the Council has accepted a main housing duty are automatically entered onto the register
- Other residents can apply to join the Housing Register via an online portal

The decision will have a positive impact on those who are eligible for social housing, reduce the cost of temporary accommodation and provide a stable home for an Enfield resident.

In discussion with NLMHA, they have confirmed they have due regard to the Public-Sector Equality Duty to eliminate unlawful discrimination; advance equality of opportunity between people who share a protected characteristic and those who don't; and to encourage or foster good relations between people who share a protected characteristic and those who don't. The HA has provided policies to support the allocation (managed and monitored directly by LBE Housing Advisory Services) and ongoing housing management.

The council will retain 100% nomination rights to the affordable housing units and ensure that properties are allocated fairly and transparently in line with the current allocations policy.

Housing Register

There is a disproportionate number of people from BAME backgrounds on the housing register. There are approximately 1026 Black applicants (African, Caribbean and Other) on the housing register, in comparison to just 484 White UK applicants. There are 2612 housing register applicants with ethnicities data recorded. Applicants with a black background make up 39.3% of applicants, whereas White UK group make up 18.5%. When comparing the demographics with the borough of Enfield, White UK group make up 40.5% of the total population.

Homeless Applicants

People from BAME backgrounds are more likely to approach our homelessness service for help. During 2018-19, we assessed 2918 households under the Homelessness legislation.



Applicants identifying as black make up the largest single group with 33% with 57% of applicants identifying as being from a non-white background. A full breakdown is set out below:

Ethnicity	%
White	30
Black / African / Caribbean / Black	
British	33
Asian / Asian British	4
Mixed / Multiple ethnic groups	3
Other ethnic groups	17
Not known	13

This means that the allocation scheme has a disproportionately positive impact on people from BAME backgrounds.

Overcrowding and Covid

The impact of the Covid pandemic on BAME communities has been profound. Research by UCL into mortality rates from Covid has demonstrated that there is an increased risk of death with BAME communities being nearly twice as likely to die than the white population. Many of the overcrowded households in the borough are from BAME communities. For BAME households this has meant an increased risk as it is far more difficult to maintain lockdown measures when the household do not have enough space to live in.

This EQIA has not identified negative impacts on any equalities group.

The council will meet its equality duties through the allocation of tenancies.



Section 3 – Equality analysis

This section asks you to consider the potential differential impact of the proposed decision or change on different protected characteristics, and what mitigating actions should be taken to avoid or counteract any negative impact.

According to the Equality Act 2010, protected characteristics are aspects of a person's identity that make them who they are. The law defines 9 protected characteristics:

- 1. Age
- 2. Disability
- 3. Gender reassignment.
- 4. Marriage and civil partnership.
- 5. Pregnancy and maternity.
- 6. Race
- 7. Religion or belief.
- 8. Sex
- 9. Sexual orientation.

At Enfield Council, we also consider socio-economic status as an additional characteristic.

"Differential impact" means that people of a particular protected characteristic (eg people of a particular age, people with a disability, people of a particular gender, or people from a particular race and religion) will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and provide evidence to explain why this group might be particularly affected. If there is no differential impact for that group, briefly explain why this is not applicable.

Please consider how the proposed change will affect staff, service users or members of the wider community who share one of the following protected characteristics.

Detailed information and guidance on how to carry out an Equality Impact Assessment is available here. (link to guidance document once approved)



Age

This can refer to people of a specific age e.g. 18-year olds, or age range e.g. 0-18 year olds.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people of a specific age or age group (e.g. older or younger people)?

Please provide evidence to explain why this group may be particularly affected. The revised housing allocations scheme is intended to have a positive differential impact on families with children over the age of 15. In the previous allocations scheme, families with children under the age of 15 were the only group eligible for houses containing gardens. As houses with gardens tend to be larger properties and are in short supply, removing this limitation means that eligible families with children of all ages will have equal opportunities to obtain larger houses.

The allocation scheme limits the ability of 16 and 17 year old to bid for properties, although they are still able to join the housing register. This is because they would normally be housed under the provisions in the Children Act. The Exceptions Panel has the ability to award points in exceptional circumstances.

Mitigating actions to be taken

The service will work closely with Childrens Services to ensure that there is a joined up approach to the provision of accommodation to young people through co-location of services and case conferences.

Disability

A person has a disability if they have a physical or mental impairment which has a substantial and long-term adverse effect on the person's ability to carry out normal day-day activities.

This could include: physical impairment, hearing impairment, visual impairment, learning difficulties, long-standing illness or health condition, mental illness, substance abuse or other impairments.

Will the proposed change to service/policy/budget have a **differential impact [positive or negative]** on people with disabilities?

Please provide evidence to explain why this group may be particularly affected.

The revised housing allocations scheme will have a positive impact on households with disabilities.



Government figures suggest that the number of people with disabilities and medical conditions on the housing waiting list in England has risen by almost 11,000 in two years. They show 119,621 disabled people or people with a medical condition were left waiting for an accessible home by their local authority in 2018/19, a rise of more than 10% since 2016/17. The public consultation produced a strong response with 577 responses, and 37% of responses indicating that they had some form of illness or disability.

Mitigating actions to be taken

We will monitor the implementation of the revised scheme to ensure that the scheme is not having a differential impact on people or households with protected characteristics.

Gender Reassignment

This refers to people who are proposing to undergo, are undergoing, or have undergone a process (or part of a process) to reassign their sex by changing physiological or other attributes of sex.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on transgender people?

Please provide evidence to explain why this group may be particularly affected.

There is a lack of available data in this area. However, we do not believe that the revised housing allocations scheme will have a differential impact (positive or negative) on transgender people. Properties will be allocated on the basis of need rather than household characteristics.

Mitigating actions to be taken

We will monitor the implementation of the revised scheme to ensure that the scheme is not having a differential impact on people or households with protected characteristics.



Marriage and Civil Partnership

Marriage and civil partnerships are different ways of legally recognising relationships. The formation of a civil partnership must remain secular, where-as a marriage can be conducted through either religious or civil ceremonies. In the U.K both marriages and civil partnerships can be same sex or mixed sex. Civil partners must be treated the same as married couples on a wide range of legal matters.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people in a marriage or civil partnership?

Please provide evidence to explain why this group may be particularly affected.

No

Mitigating actions to be taken

Pregnancy and maternity

Pregnancy refers to the condition of being pregnant or expecting a baby. Maternity refers to the period after the birth and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on pregnancy and maternity?

Please provide evidence to explain why this group may be particularly affected.

No

Mitigating actions to be taken



Race

This refers to a group of people defined by their race, colour, and nationality (including citizenship), ethnic or national origins.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people of a certain race?

Please provide evidence to explain why this group may be particularly affected.

The revised housing allocations scheme will have a positive impact on people from minority ethnic backgrounds

The revised housing allocations scheme will have a positive impact on people from minority ethnic backgrounds.

The Housing Register

The new scheme is based on the assessment of a household's needs over an extended period. This will increase the level of transparency in the allocation of properties. Overall, we expect the proposals to have a positive impact on households from BAME backgrounds. This is primarily because of their over representation on the Housing Register, driven by wider socio-economic factors.

Homeless Applicants

For homeless applicants, the new points system gives greater priority to households moving out of temporary accommodation. This is part of a wider offer that includes pre tenancy training and on-going support to assist households in the private rented sector. All homeless households will benefit from firstly moving into a stable home rather than temporary housing, and then from getting greater priority through the points system for social housing which will increase over time.

Overcrowding and Covid

The Allocations Scheme gives priority to social rented tenants living in overcrowded households, with the level of priority rising according to the level of overcrowding. The Allocations Scheme and the Placement Policy have been amending to prevent overcrowding when assessing the needs of a household and in the allocation of properties regardless of tenure. This will have a disproportionately positive impact on BAME households.

We will monitor the implementation of the revised scheme to ensure that the scheme is not having a differential impact on people or households with protected



characteristics.

The proportion of households on the housing register for whom we hold monitoring data is relatively low, with around 2600 applicants with ethnicities data recorded out of nearly 4500. As part of the implementation of the new scheme we will seek to increase the proportion of households for whom we hold monitoring data.

A number of measures will be taken to ensure that applicants are not disadvantaged including:

- 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

Religion and belief

Religion refers to a person's faith (e.g. Buddhism, Islam, Christianity, Judaism, Sikhism, Hinduism). Belief includes religious and philosophical beliefs including lack of belief (e.g. Atheism). Generally, a belief should affect your life choices or the way you live.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who follow a religion or belief, including lack of belief?

Please provide evidence to explain why this group may be particularly affected.

No

Mitigating actions to be taken



Sex

Sex refers to whether you are a female or male.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on females or males?

Please provide evidence to explain why this group may be particularly affected.

No

Mitigating actions to be taken

Sexual Orientation

This refers to whether a person is sexually attracted to people of the same sex or a different sex to themselves. Please consider the impact on people who identify as heterosexual, bisexual, gay, lesbian, non-binary or asexual.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people with a particular sexual orientation?

Please provide evidence to explain why this group may be particularly affected.

No

Mitigating actions to be taken

Socio-economic deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, low academic qualifications or living in a deprived



area, social housing or unstable housing.

Will this change to service/policy/budget have a **differential impact [positive or negative]** on people who are socio-economically disadvantaged?

Please provide evidence to explain why this group may be particularly affected.

The revised housing allocations strategy will have a positive impact on people who are socio-economically disadvantaged.

The allocation scheme uses income thresholds so that social housing is available for those who are unable to afford rent or buy privately. Household income is assessed and those earning under £37,000 are eligible to be on the housing register, unless eligible for reasonable preference. Those who are eligible for reasonable preference but not for those with rents at Social Rent or London Affordable Rent levels.

The calculation is based on the entry level to shared ownership and will apply if their gross household income is more than 10.5% of the average house price in Enfield (as published by the Office for National Statistics). This calculation is based on the minimum entry level for shared ownership in the borough. The income threshold will be set annually based on the figures for March.

The revised scheme has the effect of reserving the properties with the lowest rent levels for those with the lowest incomes.

Mitigating actions to be taken.

There is very little data held in this area. As part of the implementation of the new scheme the Council committed to seek to increase the proportion of households for whom we hold monitoring data.

We will monitor the implementation of the revised scheme to ensure that the scheme is not having a differential impact on people or households with protected characteristics.



Section 4 – Monitoring and review

How do you intend to monitor and review the effects of this proposal?

Who will be responsible for assessing the effects of this proposal?

Equalities data on ethnicity and disability is currently captured for some applicants but is not comprehensive. Equalities data is not currently collated on religion, sexual orientation or gender reassignment.

In future, applicants will be asked the Council's standard monitoring questions in relation to religion, sexuality and gender reassignment, as well as the standard Council equalities questions on age, gender, ethnicity and whether the applicant or household has a disability.

The Head of the Housing Advisory Service will have overall responsibility for the implementation of the mitigating actions. A full review of the impact of the revised allocations scheme is carried out on an annual basis, following adoption in 2020.



Section 5 – Action plan for mitigating actions

Any actions that are already completed should be captured in the equality analysis section above. Any actions that will be implemented once the decision has been made should be captured here.

Identified Issue	Action Required	Lead officer	Timescale/By When	Costs	Review Date/Comments