

Section 1 – Equality Analysis Details

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| Title of service change / policy or budget change/project plan that you are assessing | Revised Housing Allocations Scheme |
| Team/ Department | Housing |
| Lead officer(s) name(s) and contact details | Richard Sorensen, Homelessness Transformation Programme Manager Richard.Sorensen@enfield.gov.uk |
| Project sponsor | Joanne Drew |
| Date of EQIA completion | 12/05/2 |

Section 2 – Summary of Proposal

Please give a brief summary of the proposed project plan or change to service / policy/ budget.

Please summarise briefly:

What is the proposed project or change?

What are the reasons for the proposal or change?

What outcomes are you hoping to achieve from this change?

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 Current Scheme – Homeless applicants

Homeless applicants make up the majority (roughly 75%) of households on the register. There are currently just under 3,300 households in temporary accommodation awaiting rehousing, with an average length of stay of 2.5 years in nightly paid accommodation. Currently 2800 households (86% of the total) have been in temporary accommodation more than 6 months with 1500 households having been there for three or more years.

Homeless applicants are awarded 200 points on the register, which although low is sufficient for a small number of households (150) to be successful each year in securing social rented housing. Where a household moves out of temporary accommodation the existing scheme penalises them by removing their priority for housing.

Roughly 50% of homeless applicants have become homeless due to the loss of a tenancy in the private rented sector. Temporary accommodation is therefore seen as a more secure option for residents due to their previous experience.

This combination of factors is driving a year on year increase in the number of households living in temporary accommodation.

The Current Scheme – other applicants

The current scheme is based on a quota system. Applicants are categorised into six groups:

1. Tenants living in Council and Housing Association Homes
2. Estate Regeneration Tenants with Decant Status
3. Special Applications and Quotas
4. Households in temporary accommodation
5. Mobility applicants (direct offers)
6. Sheltered Housing applicants (direct offers)

Applicants are also awarded points to reflect their assessed needs. Each year the council published a lettings plan setting out the number of homes expected to become vacant and the proportion of these to be let to each group. Once the quota is reached for a group, applicants within this group are unable to bid for homes. Taking 2019-20 as an example, this meant:

1. Tenants living in Council and Housing Association Homes - 96 homes
2. Estate Regeneration Tenants with Decant Status – 188 homes
3. Special Applications and Quotas – 168 homes
4. Households in temporary accommodation – 150 homes

Changes to the estate regeneration programme will mean a reduced need for existing tenants to be decanted.

Proposed Changes

Our revised Housing Allocations Scheme is the Council's response to the challenge of addressing the housing needs of a wide range of different households whilst recognising that for most people, the private rented sector is the only option currently available.

It is designed to give priority for social housing to those people that are most in need of help. In looking at need we want to ensure that we look at the lifetime needs of a household rather than just looking at their immediate situation. In developing the new approach, we have two aims:

- To allocate council homes according to the lifetime needs of a household
- To support residents to improve their housing situation without social housing

Quota System

The largest single change to the Allocations Policy is the removal of the quota system. This means that the allocations system will be driven by the assessed needs of applicants rather than the quota system.

Homeless applicants

For homeless applicants, the new points system will give greater priority to households moving out of temporary accommodation. We recognise that for many applicants this will feel more risky than remaining in temporary accommodation and it is therefore right that these households should be rewarded.

Other applicants

The proposed changes are designed to give greater priority to those households who's needs extend beyond a point in time. The scheme places greater emphasis on the overall needs of a household and their need for other support.

Section 3 – Equality Analysis

This section asks you to consider the potential differential impact of the proposed project plan or change to service/policy/budget on different groups with a 'protected characteristic', and what mitigating actions should be taken to avoid or counteract any negative impact.

"Differential impact" means that a particular group will be significantly more affected by the change than other groups. Please consider both potential positive and negative impacts, and, where possible, 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 the following protected characteristics:

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 will 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 new 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.

We will monitor the impact of removing the 'garden rule'.

We will monitor the provisions for 16 and 17 year olds.

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.

The Current Scheme

The current scheme is driven by the quota system. This means that for households who do not require a wheelchair adapted property there is an upper limit beyond which residents are unable to bid. In 2019-20, the limit was reached in February for applicants with medium medical priority. This meant that applicants were unable to bid until April 2020.

There is no provision within the existing scheme for residents with limited mobility living in high rise buildings.

There is provision within the scheme for applicants with disabilities or health needs, but this is limited to households needing one bedroom. Larger households cannot be prioritised for housing. This means that households with children who have disabilities cannot be prioritised for housing.

The quota system includes a single category for applicants with limited mobility. This encompasses a range of needs from fully wheelchair accessible properties through to level access properties. This means that applicants needing a wheelchair adapted property are competing against those with a lower need for adaptations.

Proposed Changes

The new scheme removes the quotas to focus solely on a points-based allocations system. This will better reflect the level of need and provide more transparency to the way in which we allocate homes. This also means that there is no upper limit on the number or proportion of homes that are available to disabled applicants.

The new scheme gives priority to residents with limited mobility living in high rise buildings.

Households who include someone who has been diagnosed with either a mental health illness; learning disability; physical disability, sensory impairment or long-term condition can be prioritised regardless of the size of property they require.

The new scheme differentiates between wheelchair adapted properties and other adaptations. Wheelchair adapted properties will be reserved for households who specifically need them.

The new scheme is based on the assessment of a household's lifetime need rather than a specific point in time. This will therefore give higher priority to those who have an urgent need to move due to health or disability reasons. Those with an urgent need to move on grounds of illness or disability will therefore have relatively higher priority than they do under the current scheme.

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

The revised housing allocations scheme will not have a differential impact (positive or negative) on people in a marriage or civil partnership. Properties will be allocated according to assessed 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.

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

The revised housing allocations scheme will not have a differential impact (positive or negative) on pregnancy and maternity. Properties will be allocated according to assessed 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.

Ethnicity

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 Current Scheme

The 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 policy will have 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.

Proposed Changes

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 overrepresentation on the Housing Register, driven by wider socio-economic factors. The proposed changes should benefit all households equally regardless of their background.

Homeless Applicants

For homeless applicants, the new points system will give 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 draft Allocations Scheme and the Placement Policy have been amended 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.

Local Connection

The introduction of a local connection requirement may have a negative impact on travellers, Gypsies and refugees who may find it harder to establish a local

connection with Enfield. This is mitigated by the exception granted to those groups who may be discriminated against by the provision. Under these circumstances the local connection requirements may be reduced or removed. Local connection requirements do not apply to those who are entitled to reasonable preference.

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.

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.

The revised housing allocations strategy will not have a differential impact (positive or negative) on people who follow a religion or belief, including lack of belief as allocations will be made on the basis of need rather than protected 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.

The proportion of households on the housing register for whom we hold monitoring data is low, and equalities data is not currently collated on religion, sexual orientation or gender reassignment. As part of the implementation of the new scheme we will seek to increase the proportion of households for whom we hold monitoring data.

Sex

Sex refers to whether you are a man or woman.

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

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

The revised housing allocations strategy will have a differential impact (positive or negative) on women.

Women applying for housing are more likely to have dependent children and therefore require family-sized homes whilst men applying for housing more likely to require studio or 1-bedroom home. The gender split therefore relates to the profile of different property sizes. The proposed Housing Allocation Scheme, like the current scheme, gives priority to council tenants at risk of violence and to referrals from women's refuges and therefore meets the needs of those at risk of violence against women and girls

The current policy includes provision for greater priority for those in employment. The new scheme removes this provision. Because of parenting responsibilities, proportionately fewer women may be able to work than men, or work the same hours, or earn as much. In removing the greater priority given to working households, the scheme will have a disproportionately positive impact on women.

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.

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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.

The revised housing allocations strategy will not have a differential impact (positive or negative) on people with a particular sexual orientation as allocations will be made on the basis of need rather than protected characteristics.

Mitigating actions to be taken

The proportion of households on the housing register for whom we hold monitoring data is low, and equalities data is not currently collated on religion, sexual orientation or gender reassignment. As part of the implementation of the new scheme we will 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.

Socio-economic Deprivation

This refers to people who are disadvantaged due to socio-economic factors e.g. unemployment, low income, poor health, lone parents, 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 new scheme proposes the introduction of 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 can bid for some properties 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 we will 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 will be carried out once the scheme has been in operation for twelve months.

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

Name: Joanne Drew

Signature

Section 5 – Action Plan for Mitigating Actions.

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