

For General Release

REPORT TO:	CABINET 10 OCTOBER 2016
AGENDA ITEM:	7
SUBJECT:	Consultation report and detailed proposals to amend the Council’s Housing Allocations Scheme
LEAD OFFICER:	Barbara Peacock, Executive Director People Mark Meehan, Director of Housing Need
CABINET MEMBER:	Councillor Alison Butler, Deputy Leader (Statutory) and Cabinet Member for Homes, Regeneration and Planning and Councillor Louisa Woodley, Cabinet Member for Families, Health and Social Care
WARDS:	All
<p>CORPORATE PRIORITY/POLICY CONTEXT/ AMBITIOUS FOR CROYDON</p> <p>Local authorities have a statutory duty to publish a housing allocations scheme setting out how it prioritises applications for social housing, and other matters.</p> <p>The policy context for this report is the urgent priority of managing housing demand, tackling homelessness and reducing the number of households living in temporary accommodation.</p> <p>The recommendations in this report:</p> <ul style="list-style-type: none"> • support priorities set out in <i>Ambitious for Croydon</i> to tackle the homelessness crisis and provide a fair housing policy for all of Croydon. • contribute to priorities under the themes of Independence and Liveability within the Corporate Plan, through increasing family resilience and preventing homelessness. • support commitments set out in the recent Cabinet report <i>Homes – Our Ten priorities</i> to: engage homeless people sleeping rough to offer a “hand-up” off the streets; improve conditions for homeless families placed in temporary accommodation; and set up a holistic service for families facing homelessness – our People Gateway • support the delivery of the Housing Strategy objectives: customer-focused housing advice and options; and managing and sustaining strong, successful and thriving communities • support the theme Finding a home for all within the final report of the Opportunity & Fairness Commission, which identifies housing affordability, the lack of secure affordable housing and homelessness as “<i>perhaps the greatest challenge the borough faces</i>”. 	

FINANCIAL IMPACT

Costs associated with the consultation on the proposed changes to the Council's Housing Allocation Scheme have been met within the council's existing HRA budget allocation.

Costs associated with developing and implementing the revised housing allocations scheme are primarily ICT, communications and project management costs and will be met from existing budgets. These costs relate to work to be undertaken by Capita to enable changes to the current housing management system, procurement of a new choice-based lettings ITC system and employment of project management expertise to implement the system.

These costs can be met from within existing HRA resources.

FORWARD PLAN KEY DECISION REFERENCE NO. 26.16.CAB: This is a Key Decision as defined in the Council's Constitution. The decision may be implemented from 1300 hours on the expiry of 5 working days after it is made, unless the decision is referred to the Scrutiny & Overview Committee by the requisite number of Councillors.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

Having carefully read and considered the report and the requirements of the Council's public sector equality duty in relation to the issues detailed in the body of the report, the Cabinet is recommended:

- 1.1. To consider the outcome of the consultation on proposed changes to the Council's Housing Allocations Scheme.
- 1.2. To approve the proposed amendments set out in the revised Housing Allocations Scheme attached to this report and set out in paragraph 3.12.
- 1.3. To delegate to the Executive Director People, in consultation with the Cabinet Member for Homes Regeneration and Planning, the authority to make minor revisions to the Housing Allocation Scheme as considered necessary to give effect to the operation of the Scheme.

2. EXECUTIVE SUMMARY

- 2.1 The Council faces a significant challenge in meeting the high demand for social housing, including from homeless households, with fewer council and housing association homes becoming available for let. The Council is determined to tackle this through developing an approach that focuses on preventing and reducing homelessness and the number of households in temporary accommodation, encouraging greater personal responsibility and choice, and managing the demand for social housing.

- 2.2 A number of amendments are proposed to the Housing Allocations Scheme in order to support this approach. These would strengthen the requirement that applicants have a strong connection to the borough, place more emphasis on enabling people to resolve their housing problems, provide intensive support to households to find solutions that avoid the use of emergency and temporary accommodation and promote greater choice and openness in the way that social housing is allocated.
- 2.3 A report was presented to Cabinet on 21 March 2016 setting out proposed amendments to the Council's Housing Allocations Scheme. At that meeting Cabinet gave approval to commence consultation with a wide range of stakeholders to obtain their comments and feedback on the proposed changes. This report presents the outcomes of the engagement and consultation that have been undertaken in developing the revisions to the scheme.
- 2.4 Cabinet is recommended to approve the proposed amendments to the Housing Allocations Scheme set out in this report, which will give greater priority to households that work with the Council to find solutions to prevent homelessness, increase the residency qualification to 3 years, and fully introduce a choice based lettings system. The Streets, Environment and Homes Scrutiny Sub-Committee has endorsed the recommendations at its meeting on 20 September 2016. The revised scheme is appended to this report and its approval will enable the scheme to be adopted as Council policy.

3. DETAIL

- 3.1. Across London and the south-east, councils are experiencing unprecedented levels of demand for social housing. Much of this demand relates to the rising number of households seeking assistance for homelessness. In March 2016, the Council was accommodating nearly 3,000 households in different forms of temporary accommodation. In 2015/16 the net cost to the Council of accommodating these households was £5.4m. This is a significant cost and one that the council cannot sustain over the long term.
- 3.2. Croydon has a smaller stock of social housing than many London boroughs. There are currently more than 5,000 applicants on the housing register, while the number of properties expected to become available to let this year is about 800. This means there is only one property available to let for every six applicants. Market housing for sale and rent is becoming increasingly expensive, while housing benefit is being further reduced.
- 3.3. The Housing and Planning Act, which passed into law in May 2016, places additional pressures on local authorities seeking to manage demand for social housing. Included in the Act are measures that require local authorities to sell high value voids which will result in a further shrinking of the existing social housing stock. The introduction of starter homes is likely to reduce the delivery of new affordable rent homes through planning gain and the reduction of social housing rents by 1% per year for four 4 years under the Welfare Reform and Work Bill, will impact on councils' and housing associations' business plans,

leading to fewer new affordable homes being built.

- 3.4.** Together, these factors present a real challenge for the Council, both to tackle the growing homelessness crisis and provide a fair housing policy for all of Croydon. In this context, it is important that the way in which the Council allocates housing is transparent and easy to understand for applicants, staff, council members and other stakeholders.
- 3.5.** Croydon, like other councils, seeks to manage the demand for social housing through maintaining a housing register, with details of all households that apply for social housing. The Council's Housing Allocations Scheme sets out who can apply to go on the housing register, who will be eligible for housing that becomes available to the Council, and how homes that become vacant will be let. The Council's legal obligations around housing allocations are set out in Part VI of the Housing Act 1996 (as amended) and in statutory guidance issued by the Secretary of State in June 2012.
- 3.6.** People can apply to go on the housing register if they are aged 18 or over and are eligible for social housing. Some people are not eligible for social housing because they are "subject to immigration control" or are "persons from abroad" (which can include British citizens who do not normally live in the UK). It is the government that determines the rules concerning eligibility for social housing; the local authority is responsible for assessing and verifying whether an applicant meets the eligibility criteria or not. In addition, there are a number of conditions within the Council's Housing Allocations Scheme that govern who qualifies to go on the housing register. This means that many people in housing need will not qualify to go on the housing register. The current conditions are
- You must be living in Croydon and have lived in Croydon for at least 12 months.
 - You must not be on another local authority housing register.
 - If you have enough money or resources to buy or rent a suitable home you will not qualify to go on the housing register.
 - If you have a history of antisocial behaviour you will not qualify to go on the housing register.
 - If you have a history of rent or mortgage arrears you will not qualify to go on the housing register.
 - If you have refused all the offers you are entitled to under the scheme you will not qualify to go on to the housing register.
- 3.7.** The scheme also has rules about what type and size of properties can be offered to applicants. For example, properties that include adaptations or are particularly suitable for someone with a disability or limited mobility will be restricted to those with these needs. Similarly some housing has been set aside for older people and will not be allocated to others. There are also rules that govern the size of property that applicants are entitled to, based on statutory guidance published in June 2012. For example, single person households will generally only be allocated bedsit or one bedroom accommodation. For other types of household, the rules calculate the size of property that is suitable according to the occupants of the household.

- 3.8. All of the above rules and conditions (apart from the residency qualification of 12 months) will not change as a result of the proposals in this report.
- 3.9.** The Localism Act 2011 introduced significant reforms to the allocation of social housing, providing local authorities with new flexibilities to restrict access to housing registers on the grounds of residence in their district and other qualification criteria, and to increase the priority to given to groups of applicants including members of the armed forces.
- 3.10. Croydon's current allocations scheme was approved by Cabinet in November 2012 following detailed consultation with applicants, registered providers and other stakeholders in the early part of 2012. The changes to the scheme's qualification criteria, award of priority and assessment of housing need were implemented in the latter part of 2012/13 and continued through 2013/14.
- 3.11. In March of this year, the Council's Cabinet agreed that it would like to seek views on a number of further changes to the present scheme in order to manage the current demand for social housing and increasing levels of homelessness. It was agreed that consultation would be carried out with the public and a wide range of stakeholders to find out whether people agreed with the proposals, what alternative ideas or proposals might be considered, and what people thought the impact of the proposed changes might be on them.
- 3.12. The changes proposed to the Housing Allocations Scheme are:
- (i) to increase the residency requirement so that households will have to have lived in Croydon for at least 3 years before they qualify to go on the housing register
 - (ii) to give additional priority on the housing register to households that engage with the council to find solutions to prevent their homelessness
 - (iii) to introduce a choice based lettings system which will establish an online bidding process to allocate council and housing association properties
 - (iv) to make minor amendments to incorporate the 'Right to Move' reasonable preference category introduced by the government and to update and clarify wording relating to armed forces personnel, care leavers and medical issues.
- 3.13. The overall approach to the Housing Allocations Scheme, and the purpose of the proposed amendments, is to:
- Ensure priority is given to local residents that have a strong connection to the borough through their length of residence
 - Give more emphasis to supporting people to resolve their housing problems by providing intensive support, offering a range of alternative housing options

- Reduce the number of homeless households in temporary accommodation by providing incentives to households that actively engage with the council to prevent their homelessness and removing perverse incentives that may reward or increase homelessness
- Produce an allocations scheme that provides greater choice and transparency and encourages and enables people to make realistic housing decisions
- Comply with statutory guidelines as set out in Part VI of the Housing Act 1996 and the Allocations Code of Guidance

The details of the changes being proposed and the reasons for them are set out below.

(i) Increasing the residency qualification to 3 years

- 3.14. The council's current policy states that applicants must have been living in Croydon for at least 12 months before they can qualify to go on the housing register. This recognises that social housing is a scarce resource and that it is important to make sure it is available to local people. The residency requirement is designed to ensure that applicants for social housing have a close association with Croydon through their length of residence in the borough
- 3.15. The reason for extending the period that applicants must have been living in Croydon to three years is because the current period of 12 months is not considered long enough to demonstrate a close association with Croydon. Given the current high pressures on social housing in the borough, including from homeless households, it is considered that greater emphasis should be given to local households that are experiencing high levels of housing need, although they are not homeless. This would also bring us into line with the position elsewhere in London; a survey of other boroughs showed that most have a residency qualification of between two and five years.
- 3.16. The proposed three-year residency period is thought to be a more appropriate period to demonstrate a close association with Croydon. It better reflects the time that it takes people to put down roots and fully settle into an area, e.g. through having children in schools and play groups, becoming a member of the community and establishing stable informal networks. It would be in line with statutory guidance produced for local housing authorities in 2013 ('Providing social housing for local people'), which states that all local authorities should ensure that they prioritise applicants who can 'demonstrate a close association with their local area' and that it is 'appropriate, proportionate and in the public interest' to restrict access in this way. It recommends that a reasonable period of residency would be at least two years.
- 3.17. Initial engagement on this proposal showed strong support for an increase in the residency qualification to 3 years. (Details of the outcome of the engagement and consultation are in Section 4 and Appendix 1 and 2). There was some support for an increase in the residency criteria to five years, as is

the case in some London boroughs. But this is considered to be too large a jump, is much longer than government guidance suggests and may have the effect of excluding too many applicants. By contrast, three years is considered to be reasonable and pragmatic.

3.18. The engagement responses also highlighted concerns that people fleeing violence, young care leavers, ex-service personnel and vulnerable people who may be transient or were placed out of the borough might be disadvantaged by the proposals. The current allocations scheme already gives exemption from the 12 months residency requirement to a number of groups. These exemptions have been reviewed, having regard to the government's guidance in 2013, which recommends that local authorities consider the need for exceptions to their residency requirement including, for example, care leavers placed in accommodation outside of the borough and people fleeing violence. It also says that local authorities must make an exception for certain members, or widows of members, of the Armed Forces and Reserved Forces.

3.19. The full list of exceptions that are proposed is as follows:

- A member or former member of the British Armed Forces¹ or Reserved Forces² who is applying for housing within five years of discharge unless there are exceptional circumstances that prevented an application being made, or justify an application after 5 years. We will also consider applications if you are a serving member of the Armed or Reserve Forces and are within the last 6 months of your service if you can provide a letter from your Commanding Officer confirming your last day of service.
- The bereaved spouse or civil partner of a member of the Armed Forces leaving Services Family Accommodation following the death of your spouse or partner
- A serving or former member of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of your service
- An older person whose economic circumstances are unlikely to change and applying for older persons, special sheltered or extra care housing
- An existing social housing tenant applying to live in Croydon through *housingmoves*³- the social housing mobility scheme for London designed to help tenants to move to another part of London, with priority given to households who have more bedrooms in their current home than they need or who wish to move to be closer to employment or higher education or to provide care to family members or friends.
- An applicant that has been accepted as homeless by Croydon council and is living in temporary accommodation outside the borough of Croydon
- An applicant who has been accepted as homeless by Croydon council and is owed the full rehousing duty.

¹ Armed forces includes British Army, Royal Navy and Royal Air Force.

² Reserve forces includes Reserve Land Forces (including the territorial army), Royal Naval Reserve (RNR), the Royal Marines Reserve (RMR) and the Royal Air Force Volunteer Reserve (RAFVR).

³ For more information visit the *housingmoves* website <http://www.housingmoves.org> .

- An applicant who has worked with the Gateway Service to prevent their homelessness and has moved out of borough as a result, into the private rented sector or to live with family or friends
- An applicant who is part of a witness protection scheme, or is referred through the “Safe and Secure” scheme, or who is fleeing domestic abuse and is supported by the Family Justice Centre
- Existing secure or fixed-term tenants of Croydon Council.
- Young people leaving the care of Croydon Council, regardless of whether they currently live in Croydon, and deemed to be more vulnerable than others leaving care.
- Those residing in supported housing schemes commissioned by Croydon Council.
- Verified rough sleepers, where there is proof of rough sleeping in the borough over the previous six months, prior to applying to the housing register
- Existing social housing tenants where the council is satisfied that the “Right to Move” applies

(ii) Giving a higher level of priority to applicants who actively work with the council to prevent their homelessness

- 3.20. It is proposed to introduce a higher level of priority to applicants that actively work (see paragraph 3.22 below) with the council’s Gateway Service to find solutions to prevent their homelessness. This is important to help challenge the notion that households applying as homeless will be rehoused more quickly than other applicants and to ensure there are clear incentives for households to take action to prevent homelessness. This will result in a reduction in the number of households requiring costly emergency and temporary accommodation. It will also provide a clear and easier-to-understand framework enabling applicants to take actions that can result in them being awarded a higher priority than would otherwise be the case.
- 3.21. The council’s Gateway Service provides support and assistance to all applicants faced with homelessness. The Gateway Service was initially set up to provide a comprehensive service to clients who were struggling with housing issues as a result of welfare reform and the bedroom tax. It has proved to be a hugely successful way of helping individuals to resolve their housing problems. The Gateway Service has, therefore, been extended to provide support to all clients threatened with homelessness, with the aim of enabling them to stay in their home or find a suitable alternative.
- 3.22. In order for this proposal to be transparent and effective, clear guidance needs to be provided to applicants about what we mean in practice by working with the Gateway Service to prevent homelessness. It is proposed that if an applicant has worked to achieve success in one of the following areas they should receive a higher level of priority on the housing register:

- The applicant has prevented homelessness by securing a private rented-sector property.
 - The applicant has prevented homelessness by securing or remaining in accommodation with family or friends.
 - The applicant has prevented homelessness by remaining in their existing accommodation for an agreed time, after negotiation with their landlord, with or without the council's assistance.
- 3.23. The Housing Allocations Scheme has three bands within which applicants are grouped according to their level of housing need. The application of this proposal would mean that these applicants will receive a level of priority that places them in Band 2 of the housing register. Applicants who do not respond to the support and encouragement offered, and do not take action to prevent themselves from becoming homeless, may be placed in temporary accommodation (as a result of the council accepting a full housing duty). These households will receive a lower priority and be placed in Band 3 of the housing register.
- 3.24. Initial engagement on this proposal showed there was majority support, but also some concerns (see the report on the outcome of the engagement in Appendix 2). Ensuring joined up support for care leavers and other vulnerable groups, adequate training of council staff, providing clear criteria and an understanding of expectations, and the development of adequate, affordable forms of accommodation were raised as issues. The provision of support and assistance is being discussed with voluntary and statutory sector services to ensure that those with support needs receive dedicated one-on-one help, and benefit from joined-up working with council or voluntary-sector support providers.

(iii) Introducing a choice-based lettings system

- 3.25. The Council's current Allocation Scheme and procedures provide a degree of choice for applicants over the location in which they would accept an offer and over the choice of landlord (council or housing association). However, this rather limited version of "choice" does not empower applicants sufficiently, or engage them in the process of actively choosing a home they want to live in. Many local authorities now operate an online choice based lettings system that enables applicants on the housing register to 'bid' for properties. It is proposed to introduce a similar system in Croydon.
- 3.26. Choice-based lettings involves a shift in onus from the council making offers of housing to applicants, to enabling individuals to take an active role in deciding which properties to apply for through making online bids to express their interest. As part of this process, those seeking housing would be provided with information on the numbers, types and locations of properties available and also information on the priority and length of waiting time of those who are successful. By doing this, applicants can see what level of priority and waiting time will be required to bid successfully for certain types of property or certain

areas.

- 3.27. At the end of each bidding cycle, the council would select a shortlist of applicants to view the property. A final offer is made after the viewing to the highest priority applicant that wishes to accept the property; applicants having greater or more urgent needs are given more priority (effectively “currency”) in the bidding process. When a property is let, details of the priority band and application date of the successful applicant and how many applicants in total applied for the property will be published in the same places as the details of the current vacancies/homes. This will enable applicants to rate their own prospects for a similar property and contributes to the process being more transparent and accountable.
- 3.28. The introduction of a choice-based lettings system has a number of potential benefits. First, it promotes a more enabling approach that empowers people to make decisions over where they live and to exercise choice. Second, if a household has chosen where they want to live, rather than the council deciding for them, they are likely to be happier in their home which in turn promotes community cohesion and sustainment. Third, certain groups of applicants can be given higher priority to bid, or time limited priority depending on their need and circumstances which could potentially reduce the resources the administrative impact of responding to suitability reviews, judicial reviews and other legal challenges. And importantly, the system is likely to be perceived as a fairer, more transparent mechanism to allocate housing.
- 3.29. Engagement responses showed that most people thought choice-based lettings would have a positive impact, citing quicker rehousing, greater choice and control, and more likelihood that they would be happy with the property they were allocated. 66% of respondents agreed with the proposal to introduce choice-based lettings and a further 11% agreed, but expressed some reservations; 14% disagreed. The main concerns were around supporting people with bidding and getting online, and ensuring that more assertive, IT capable people would not benefit at the expense of disadvantaged or vulnerable groups. The Equality Analysis has also identified the need for mitigating actions to ensure that some protected groups, particularly those with a disability and older people who may be less able to access or participate in online bidding are not disadvantaged by the move to choice-based lettings.
- 3.30. Support would need to be provided to vulnerable households to enable them to make an informed choice about where they wish to live, to navigate the bidding system and this support will be provided in partnership with voluntary and community groups, other partners and stakeholders. The role of Housing staff will also change from assessors and administrators, to facilitators and enablers. There will also need to be liaison with voluntary organisations and Adults and Children’s services to ensure a proactive approach to enabling older and disabled people and vulnerable groups to manage online bidding and providing support or alternative systems if necessary.

Additional changes needed to the Housing Allocations Scheme

- 3.31. Regulations were introduced by the government in April 2015 to ensure that existing tenants who are seeking to move between local authority areas in England for 'work related reasons' will not be disadvantaged. The 'Right to Move' regulations require that local authorities do not apply local connection restrictions to existing social tenants seeking to transfer from another local authority district where the local authority is satisfied they have reasonable preference because of a need to move to take up or maintain employment and that otherwise this would cause hardship. It is proposed to amend the Housing Allocations Scheme to include a new Right to Move reasonable preference category which will place applicants meeting the criteria into Band 3 of the scheme.
- 3.32. In addition, a number of minor revisions are needed to the Housing Allocations Scheme to clarify and update the council's policy relating to members of the armed services, care leavers and people with medical priority.

4. CONSULTATION

- 4.1. Under s.168 of the Housing Act 1996, when a council makes a major alteration to the Allocations Scheme, the Council should bring the effect of the alteration to the attention of those likely to be affected by it. At the Cabinet meeting on 21 March 2016, approval was given to the Executive Director of People, in consultation with the Cabinet Members for People and Communities and for Homes Regeneration and Planning, to commence consultation on the proposed amendments to the Council's Housing Allocations Scheme.
- 4.2. An online engagement survey was launched by the council on 14 June on 'Changes to our housing register rules and priorities'. The survey ran for four weeks in order to seek initial views on the three proposed changes to the Housing Allocations Scheme and to help inform the development of more detailed proposals. A total of 230 responses were received, from residents, applicants, businesses, community organisations and service providers. A report on the outcomes of this engagement survey is provided in Appendix 2.
- 4.3. Following the initial engagement survey, a more detailed consultation process has been undertaken. An online consultation survey was launched on 25 July for 6 weeks, which presented details of the proposals to increase the residency requirement and to give higher priority to applicants that work with the council prevent their homelessness, including the proposed exceptions and criteria that would be used in applying the policies. Respondents were asked whether they agreed or not with the proposals and for comments on their impact on them and alternative suggestions.
- 4.4. The introduction of choice based lettings was not included in the detailed consultation following strong support in the engagement survey. The provision of choice-based lettings and online bidding will require a detailed implementation plan, to specify and procure the necessary IT infrastructure to

run the system. The issues raised through the engagement process and those identified in the Equalities Analysis are being worked into the development, procurement and implementation plan. Further discussions will be taking with voluntary groups, including those representing older people, BME households and disabled people, and with adult social care teams, to develop appropriate support systems in response to the issue highlighted above.

4.5. The consultation has been supported by a detailed communications plan to ensure that the survey is widely promoted and to maximise the number of people taking part and the range of stakeholders consulted. This has included:

- promotion via web banners on the council’s website, internal screens in the council’s offices and plasma screens in Access Croydon
- use of social media – facebook, twitter, and streetlife, to promote the survey
- publicity through the council’s weekly e-bulletin and the online Your Croydon magazine
- correspondence to MPs, the GLA, other statutory bodies, and neighbouring London boroughs
- a flyer distributed to every council tenant, enclosed with their rent statement, encouraging them to complete the survey
- emails to registered providers, resident associations and over 800 voluntary sector and community organisations
- emails to applicants on the housing register

4.6. Additional face to face consultation has been undertaken through meetings, telephone calls and workshops with key stakeholders, including:

- consultation meetings with homeless households in temporary accommodation
- staff engagement including stakeholder sessions with staff in adults social care and children’s services
- meetings with and calls to voluntary sector organisations and representatives
- telephone interviews with registered providers
- programmed meeting with the Streets, Environment and Homes Scrutiny Sub-committee

4.7. The outcomes of the consultation are reported in Appendix 1. In total, 467 people completed the online consultation survey. The majority were local residents, including over a hundred housing applicants. Responses were also provided by a range of organisations and other stakeholders. Overall, the responses showed strong support for the following two proposals, across all groups of respondents.

Do you agree or disagree with the proposal that housing applicants will need to have lived in Croydon for three years prior to applying for housing, with some exceptions?

	Agree	Disagree	Not sure	Total responses
Applicants	83	13	12	108
Other residents	215	27	22	264
Organisations	10	2	3	15

Other	17	0	0	17
Total	325	42	37	404
%	81%	10%	9%	

Do you agree with the following proposed change to the Housing Allocations Scheme: Households that work with the council's Gateway Service to successfully prevent their own homelessness will be given a higher level of priority on the housing register?

	Agree	Disagree	Not sure	Total responses
Applicants	52	19	14	85
Other residents	142	43	27	212
Organisations	12	0	2	14
Other	12	2	0	14
Total	218	64	43	325
%	67%	20%	13%	

- 4.8. In relation to the residency qualification proposal, the proposed exceptions were generally well supported. Respondents were asked about the impact on them of the proposal. There was a common perception among applicants that they were competing against households that were not long-term residents of the borough and that the proposal was both fair and would improve their chances of rehousing.
- 4.9. Some comments were made that that the exception for domestic violence was too restrictive. As a result of the feedback from consultation, this definition will be expanded to include referrals from the police and other relevant agencies. Another issue raised in the survey and in discussions with stakeholders was that long-term residents who leave the borough for a temporary period for a legitimate reason should not be disqualified. This will be considered in assessing applications, but the onus will be on the applicant to prove residency; the key test is whether Croydon remained their principal home.
- 4.10. In relation to the homelessness prevention proposal, support for the three criteria to be applied in assessing whether to give a higher priority was also strong. In terms of its impact, applicants thought it would incentivise them to try and find a solution, such as staying longer with family or friends. The main concern was about their ability to secure suitable and affordable accommodation in the private sector.
- 4.11. Other comments and suggestions on this proposal included giving more priority to working people (this is already the case within the current scheme), and a concern that it would create additional demand for a service from people that might otherwise have helped themselves. On this point, the focus of this proposal is reducing the use of temporary accommodation, and so the higher priority will only be given to applicants where it is verified by staff in the Gateway service that they are facing homelessness.
- 4.12. In addition to the survey responses, direct consultation with 32 housing applicants living in temporary accommodation took place. Their views have been reflected in the comments summarised in 4.10 above. There was also an opportunity through the interviews to identify their ability to access the internet

and their confidence in doing so. This was generally found to be high.

- 4.13. Registered provider partners were contacted by telephone and some also completed the online survey. Overall, housing associations were supportive of the proposals. A number commented that they were working with other local authorities that had introduced a five-year qualification, and so they felt that Croydon was being reasonable and pragmatic.
- 4.14. Focused discussion with voluntary sector organisations took place with groups representing older people, people with learning disabilities, young people and BME households. All were generally positive about the proposals understanding the pressures on local authorities to tackle increasing numbers of people living in temporary accommodation, and the associated costs of this. The proposal to introduce choice-based lettings was strongly supported because of the additional choice and decision-making it gave people. Positive suggestions were made about how more vulnerable or older people could be assisted to overcome any potential disadvantages associated with the proposals.
- 4.15. A report on the proposed changes to the Housing Allocations Scheme has also been presented to the Streets, Environment and Homes Scrutiny Sub-committee at their meeting on 20 September 2016. The sub-committee has considered the proposals and the consultation and has endorsed the recommendations contained in this report.
- 4.16. If the proposals outlined in this report are approved, it is planned to take a two stage approach to implementing the changes to the allocations policy. Changes relating to the extension of the residency qualification to three years, and the additional priority to be given to those who work with the Gateway service to prevent their homelessness, need only minor changes to be made to the Council's housing IT system. Neither of these revisions will be implemented retrospectively; they will only apply to new housing applicants from a given date. If approved, officers will work with Northgate, the IT system supplier, to establish a date from which the new policy will be effective. There are other procedural and administrative changes to be made to how applications are assessed and processed, but these do not require significant periods of time to develop. There will be work around raising awareness of the changes with both Croydon residents and partner agencies. It is anticipated that these changes will go live by the end of December 2016.
- 4.17. The introduction of choice based lettings will require a new software product to be procured (or developed in-house). Work is underway on developing a specification and approaching the market for a suitable supplier, but the procurement timetable will mean that these changes to policy will not go live until spring 2017 (target date is end of March 2017). These changes will apply to all housing register applicants and a comprehensive communications plan is being developed, which will include face to face training and support for applicants as required

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

The estimated costs of the scheme include one-off software, associated IT, project management and communication costs, totaling £140k in 2016/17. Additionally, there will be an annual software licence fee of £15k for 2017/18. The total cost of £155k will be funded from existing revenue resources within the HRA. This would not lead to any overspend or increase our monitoring position.

5.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2016/17 £'000	2017/18 £'000	2018/19 £'000	2019/20 £'000
Revenue Budget available				
Expenditure	140	15		
Income				
Effect of decision from report				
Expenditure	140	15		
Income				
Remaining budget	<u>0</u>	<u>0</u>		
Capital Budget available				
Expenditure				
Effect of decision from report				
Expenditure				
Remaining budget	<u></u>	<u></u>	<u></u>	<u></u>

5.2 The effect of the decision

The main costs that would result from Cabinet's approval of the recommended changes to the Housing Allocations Scheme are those associated with the development and implementation of choice-based lettings. These are primarily ICT, communications and project management costs and will be met from existing budgets.

The development of choice-based lettings requires that new software to run the online bidding system is procured. There are a number of well-established suppliers of these systems and a process of market-testing will be undertaken to secure best value. There would also be additional costs associated with the work that the council's existing ITC providers (Capita and Northgate) will need to carry out to ensure the new software works alongside the existing housing management system. The complexity of the project requires the input of external project management expertise to implement the system.

5.3 Risks

The risk of the project going over-budget has been mitigated by undertaking initial soft-market testing of software suppliers to identify costs at the outset and by applying upper range estimates of other costs.

The council will be reviewing its current housing management system over the coming months. As this may potentially result in a new system being procured in future which could incorporate a choice based lettings function, a contract limit of two years has been specified for the software.

5.4 Options

Different procurement options have been considered for the online bidding system; the route selected chosen will enable the implementation of choice based lettings to proceed quickly, ensure best value and comply with public sector procurement rules.

5.5 Future savings/efficiencies

It is anticipated that these proposals will have a beneficial impact in generating future savings and efficiencies in the following areas:

- Reduced void times and savings to the HRA
- Reduced B&B costs

The savings are however, yet to be quantified. Modelling will be developed based on the initial outcomes, post implementation.

(Approved by: Lisa Taylor, Assistant Director of Finance and Deputy S151 Officer)

6. COMMENTS OF THE COUNCIL SOLICITOR AND MONITORING OFFICER

6.1 The Solicitor to the Council comments that there are four necessary elements to statutory consultation:

- it must take place at a time when proposals are still at a formative stage;
- the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
- adequate time must be given for consideration and response; and
- the product of consultation must be conscientiously taken into account in finalising any statutory proposals.

6.2 The Public Sector Equality Duty as set out contained in Chapter 1 of Part 11 of the Equality Act 2010 has three principle requirements which can be summarized as the need to:

- eliminate discrimination (in all its forms, including direct and indirect discrimination);
- advance equality of opportunity; and
- foster good relations between those sharing or not sharing protected

characteristics.

- 6.3 Again, in considering this duty and making any decisions, case law has identified the key principles that must be observed:
- Those taking the decision must be aware of their duty to have “due regard” to the requirements of the PSED;
 - The “due regard” duty must be fulfilled before and at the time that a particular policy that might affect protected groups is being considered by the public authority in question. It involves a conscious approach and state of mind;
 - The duty must be exercised “in substance, with rigour and with an open mind”.
- 6.4 The Council’s Housing Allocations Scheme must take into account the interests of children as required under the Children Act 1989.
- 6.5 The Council Solicitor comments that advice has been taken to confirm that the Scheme properly reflects both the Council’s discretionary powers and obligations in relation to homelessness.

(Approved by: Nicola Thoday, Corporate Lawyer on behalf of Jacqueline Harris-Baker the Acting Council Solicitor and Acting Monitoring Officer)

7. HUMAN RESOURCES IMPACT

- 7.1 There will be some impact on the role of existing housing staff in the Allocations team as a result of the proposed changes to the Housing Allocations Scheme. In particular, the introduction of a choice-based lettings system will remove some aspects of the current role concerned with administering the offer process, by which applicants are matched to and offered suitable properties. Instead, there will be a greater emphasis within the role on supporting and enabling applicants to make bids using the online bidding system.
- 7.2 This will have some implications in terms of the need for training and support to staff to take on these new tasks. However, no impact on current staffing levels is anticipated as a result of the proposed changes. Any changes that are required to the current roles will be done in consultation with staff, and unions (where relevant), and in accordance with the Council’s HR policies and procedures.

(Approved by: Deborah Calliste, HR Business Partner, on behalf of the Director of Human Resources)

8. EQUALITIES IMPACT

- 8.1 The Equality Policy 2016 - 20 defines the Council’s strategic approach and commitment to equality. It is supported by equality objectives which are found in the council’s opportunity and fairness plan 2016 – 20. These have identified as key borough issues, housing, homelessness, affordable homes, temporary accommodation and use of empty properties. The proposed changes to the

Housing Allocations Scheme support equality objectives which seek to increase support to people to prevent homelessness, and reduce temporary accommodation, especially for those from BME backgrounds and women.

- 8.2 A full Equalities Analysis of the proposals has been undertaken and is provided in Appendix 3 to this report. The initial assessment of the impact identified that BME, young and female-headed households are more highly represented among housing applicants. However it is not considered that the proposal to increase the residency qualification to three years will have a significant or disproportionate impact on households from these protected groups, although it is likely that opportunities for rehousing will improve for those households meeting the residency criteria.
- 8.3 The initial analysis also considered whether the proposal to give higher priority to households that take action to prevent homelessness might disadvantage people from some protected groups, where they have fewer opportunities to take action to resolve their homelessness. For example, some disabled people with specific support needs may be less able to take action to arrange alternative accommodation in the private sector. In order to mitigate any potential impact, adequate staff training and provision of support will need to be provided within the Gateway service, including the development of links with other support services, to overcome these barriers.
- 8.4 In completing the full Equalities Analysis, evidence has been compiled from existing documents and reports on homelessness and housing need, research into the operation of new choice based software systems and from consultation with a range of groups representing those who may be affected by the proposals. The latter has included focused discussions with voluntary sector groups representing older people, people with learning disabilities, young people and BME households.
- 8.5 The main issue considered in the full Equality Analysis is whether the introduction of a new online bidding system might potentially disadvantage those who may have difficulty getting online or actively participating in an online system. The groups most likely to be affected are older people, disabled people and some BME households for whom English is not a first language. The assessment identified that the software systems used to operate choice based lettings include a translation function which would overcome potential language barriers; it therefore concluded that there would not be a disadvantage for this group. Discussions with groups representing older and disabled people have identified a range of support, training, and technical solutions (such as auto-bids, and ability to identify non-bidders) that can be applied to mitigate and minimise the impact.
- 8.6 The conclusion of the Equality Analysis is that no major change to the policy is required. The Equality Analysis demonstrates that the policy is robust and that by including within the implementation process for choice-based lettings an action plan to address the issues above, any potential for disadvantage will be minimised and mitigated.

9. ENVIRONMENTAL IMPACT

- 9.1 No specific adverse environmental impacts have been identified resulting from the recommendations contained within this report.

10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 There are no crime and disorder impacts as a result of the recommendations contained within this report.

11. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

The report sets out recommendations to amend the Council's Housing Allocations Scheme that will contribute to preventing homelessness and reducing the number of households in temporary accommodation, encourage greater personal responsibility and choice, and help manage the increasing demand for social housing.

12. OPTIONS CONSIDERED AND REJECTED

The engagement survey undertaken prior to consultation provided an opportunity to identify and assess alternative options and suggestions in relation to each of the three main proposals considered. For example, in relation to the proposed increase in the residency criteria, responses were received proposing both longer and shorter periods than three years. Consideration was given to these alternative options in the development of the final proposals and included in the consultation information that was prepared for the consultation.

APPENDICES

- 1) Report on the outcome of consultation on proposed changes to the Housing Allocations Scheme
- 2) Report on the outcome of the engagement survey 14 June - 10 July 2016
- 3) Full Equality Analysis dated 9 September 2016
- 4) Revised Housing Allocations Scheme

CONTACT OFFICER: Mark Meehan, Director of Housing Need, People Department.
Tel. Ext 65474

BACKGROUND PAPERS

None

APPENDIX 1: CONSULTATION REPORT

Have your say on the future of the Housing Allocations Scheme

Report on the outcome of consultation on changes to the Housing Allocations Scheme

Introduction

In March 2016, the council's Cabinet approved a programme of consultation on proposed changes to the council's housing allocations scheme. The proposed changes, in brief were:

- To increase the residency qualification from 1 to 3 years
- To increase priority to applicants that actively prevent their homelessness
- To introduce choice based lettings

Under s.168 of the Housing Act 1996, when a council makes a major alteration to the Allocations Scheme, the council should bring the effect of the alteration to the attention of those likely to be affected by it.

An initial online engagement process was launched on 14 June, and ran for 4 weeks. This attracted 230 responses and a report on the outcomes was produced in July 2016. This report was used to inform and shape the more detailed proposals included in the consultation

Consultation on proposed changes to the housing allocation scheme has been undertaken in two ways:

- An online consultation survey
- A series of consultation sessions with stakeholders through meetings, telephone surveys and workshops

This report provides details of the consultation and the responses received.

Online consultation survey

The online consultation survey was launched on 25 July and ran for a period of 6 weeks. A detailed communications plan was drawn up to ensure that the survey was widely promoted in order to maximise the number of people taking part and the range of stakeholders consulted. Targeted communications were sent to those most affected by the proposals and the organisations working with them. Promotion of the survey was undertaken in the following ways:

- promotion via web banners on the council's website, internal screens in the council's offices and plasma screens in Access Croydon
- use of social media – facebook, twitter, and streetlife, to promote the survey
- publicity through the council's weekly e-bulletin and the online Your Croydon magazine
- correspondence to MPs, the GLA, other statutory bodies, and neighbouring

London boroughs

- a flyer distributed to every council tenant, enclosed with their rent statement, encouraging them to complete the survey
- emails to registered providers, resident associations and over 800 voluntary sector and community organisations
- emails to applicants on the housing register

The online consultation survey was intended to build on the earlier engagement by providing more developed and detailed versions of the proposed changes, including for example, information on proposed exceptions and the criteria to be used in applying policies. The aim was to give respondents as much information as possible to enable them to understand and comment on the proposals in the survey. To achieve this, a detailed consultation pack was prepared, which included an information document, which set out the background, reasons for and alternative options considered for each of the proposals and a Question and Answers document.

The consultation focused on two of the key proposals included in the earlier engagement:

- (i) Increasing the residency qualification to 3 years
- (ii) Giving a higher level of priority to applicants who actively work with the council to prevent their homelessness

The consultation survey asked respondents if they agreed or not with the two proposals, what impact they would have on them, whether they agreed with proposals for how the council would apply the policies, and what further comments and alternative suggestions they had.

The proposal to introduce choice-based lettings was not included in the consultation survey. The engagement survey showed strong support for this proposal and it will be recommended to Cabinet for approval. The detailed development of this proposal will be undertaken through the process of market testing and procurement and implementation planning and will depend on the technical capacity and detailed specification of IT systems to enable choice-based lettings. The issues raised through the engagement survey and identified in the Equalities Analysis will be worked into the development, procurement and implementation plan. Further discussions will be taking with voluntary groups, including those representing older people, BME households and disabled people, and with adult social care teams, to develop appropriate support systems in response to the issues highlighted.

In total, the online consultation survey received 467 responses, broken down as follows:

A Croydon resident (who is not a housing applicant)	303	64.88%
A Croydon housing applicant	122	26.12%
An organisation representing those who may be affected by proposals	24	5.14%

Other	18	3.85%
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Most of the responses were from residents including housing applicants. Organisations responding included schools, youth organisations, registered providers, advice services, community groups, and support providers. Other stakeholders that responded were landlords, other boroughs, councillors and council staff.

286 respondents (just over 60% of the total) provided details about their gender, age, ethnicity and any disabilities. 70% of these were female, and 84% were between the ages of 25 and 64. 41% of those responding to the question on ethnicity were white British, 9% from other white groups, 26% from black ethnic groups, 7% mixed race groups and 3% from Asian ethnic groups. 45 people considered themselves to be disabled, which was 15% of those answering this question (and 10% of total respondents). The most common disabilities were limited mobility and mental health problems.

Proposal 1: To increase the residency qualification from one to three years

Question 1: Do you agree or disagree with our proposal, that housing applicants will need to have lived in Croydon for three years prior to applying for housing, with some exceptions?

	Agree	Disagree	Not sure	Total responses
Applicants	83	13	12	108
Other residents	215	27	22	264
Organisations	10	2	3	15
Other	17	0	0	17
Total	325	42	37	404
%	81%	10%	9%	

Support for this proposal was high among all groups of respondents.

Question 2: The council is proposing a number of exceptions to this policy. Some of these are included within the existing policy or are required by law, and will be retained. Tell us whether you agree, disagree, or are not sure about the following additional proposed exceptions.

	Agree	Disagree	Not sure	Total responses

Young people leaving the care of Croydon Council, regardless of whether they currently live in Croydon	163	95	82	340
Those residing in supported housing schemes commissioned by Croydon Council	214	64	50	328
Verified rough sleepers, where there is proof of rough sleeping in the borough over the previous six months	195	87	55	337
Persons in prison whose last settled address was in the borough	120	130	83	333
Referrals through the 'Safe and Secure' scheme	211	52	71	334
Those who are part of witness protection schemes	239	44	50	333
Referrals through 'Housing Moves'	145	89	99	333
People fleeing domestic abuse referred via the Family Justice service	261	40	32	333

The majority of respondents supported the proposed exceptions. The only one of the exceptions that was not widely supported concerned the proposal to exempt persons in prison whose last settled address was in the borough.

Impact of the proposal

The proposal addressed a common perception among applicants that they were competing against households that were not long-term residents of the borough. Where an impact was identified, it was mostly viewed as positive, in terms of an improvement in their chances of rehousing (all quotes in italics):

Hopefully this would help long existing Croydon residents get a higher priority for housing in their home borough.

It also means that those applicants who have been living in the borough for years are not competing against as many others for housing

May be moved higher up the system and get a house sooner.

Others supported the proposal even though they thought it would have little impact on their

own position:

The proposal above would have no impact on me or the people I represent as I was born in Croydon. I feel that it's a more than fair proposal which will benefit people like me who has lived in the borough all their lives.

The most common response was that the proposal would make the system fairer, recognising the potential migration of people to Croydon from other boroughs:

Applicants who have history and friends and family in Croydon must have priority. To move them away or deny them support in favour of applicants with no connection to Croydon is cruel and encourages resentment and divided communities.

There are a lot of people who have moved to Croydon as rentals in London are no longer affordable and in search of good education.

I would hope it would mean some areas becoming communities again with local people staying local

Comments and suggestions made by respondents (officers responses below in bold)

1. There should be an exceptional circumstances category

We have not included a separate category as to do so often encourages applicants to claim that their circumstances should be considered exceptional. Instead what we aim to achieve with the current wording is a clear definition of who does and who does not qualify for access to the housing register.

2. The exceptions do not seem to cover some circumstances in which people may need to move to the borough as a result of violence. On the other hand, some thought there was too much scope for people to fabricate domestic violence and there needed to be more rigorous checks. Example comments:

Escaping a violent father doesn't seem to qualify

We would like to see the exception to the residence requirement on domestic violence grounds to apply to all applicants and not restricted to those referred by the Family Justice Centre.

Applicants who flee violence will be able to apply to the local authority for support under the homelessness legislation. Where the council owes a duty to the applicant, they will be treated as an exception to the residency criteria (applicants owed a full duty under the legislation are deemed to be exceptions). In relation to the requirement that the applicant be referred by Family Justice Centre, as a result of feedback from consultation, this definition will be expanded to include the Police and other relevant agencies.

3. People who leave the borough for a temporary period for a legitimate reason should not be disqualified if they are long-term residents of the borough. Examples given were:

People who have moved temporarily out of borough to stay with family or relatives for health reasons or following a family breakdown;

A young person who has moved with their family out of borough but due to family breakdown has been forced to return to the borough.

People who temporarily move from the borough to care for a sick or elderly relative and then return to find they don't meet the residency requirement

Applicants will be required to show that they have lived in Croydon for three years prior to submitting their housing application. The circumstances outlined in the comments will all be considered, with the onus on the applicant to prove residency; the key test is whether Croydon has remained their principal home. This can be verified via council tax registration, bank statements, utility bills and so on.

4. There were concerns that some of those falling within the exception groups will qualify for housing even if they have no strong connection to Croydon and could equally live elsewhere. It was suggested that instead of a blanket policy the council should investigate in each case the strength of the connection to Croydon. Some of these comments are copied below:

Care leaver exception should only apply to those with a connection to the borough and not to every care leaver who has recently been placed in the borough from elsewhere.

Exceptions should be used sparingly for most priority cases where there will be real impact if they have to move to borough

You do not say whether the above groups will have AUTOMATIC access to the housing register, or whether other avenues available to them are considered. Eg Those returning from prison to the borough would presumably have some family connections here and the possibility of returning to that family

Younger persons whom have lived in Croydon already is ok. Moving those into the borough when they have lived elsewhere (without a connection previously and haven't been moved because of foster placements), am not sure about.

I think this policy needs to deter any further increase of these issues. For example accepting referrals from young people leaving the care system. The borough is already at capacity and so it would not be fair to accept referrals offering housing where the temptation to participate is high. However, if the cabinet felt strongly to house such young people there would have to be rules like the 3 year residency as also proposed.

The council needs to develop a definitive policy that can be applied to all housing applicants; it does not have the resources to look at each housing application on a case by case basis. The care leaver exception only applies to care leavers placed out of borough by Croydon council, not care leavers placed by other boroughs. The exceptions will be automatic but the online housing options tool we provide also gives housing applicants information on other housing options. The council is keen to stress the shortage of social housing and to signpost applicants towards alternatives.

Proposal 2: To prioritise homeless prevention

Question 1: Do you agree with the following proposed change to the Housing Allocations

Scheme: Households that actively work with the council's Gateway Service to successfully prevent their own homelessness will be given a higher level of priority on the housing register?

	Agree	Disagree	Not sure	Total responses
Applicants	52	19	14	85
Other residents	142	43	27	212
Organisations	12	0	2	14
Other	12	2	0	14
Total	218	64	43	325
%	67%	20%	13%	

The majority of people supported the proposal across all groups of respondents.

Question 2: The council considers that the following specific actions to prevent homelessness should result in a higher level of priority being given. Please indicate whether you agree/disagree or are not sure about the council giving higher priority to each of the circumstances below.

	Agree	Disagree	Not sure	Total responses
The applicant has prevented homelessness by securing a private rented sector property	181	74	52	307
The applicant has prevented homelessness by securing accommodation with family or friends	194	72	40	306
The applicant has prevented homelessness by remaining in their existing accommodation for an agreed amount of time	217	53	40	310

All three criteria proposed for giving additional priority were supported.

Impact of the proposal

There were few comments regarding the impact of the proposal on individual respondents.

Positive comments centred on the reward and incentive elements of the proposal:

The above proposal would benefit me and the people I represent as I have already secured accommodation with family whilst I wait for housing. I feel the proposal rewards people who need housing but are also willing to help themselves. It takes ruins people's plans who intend homelessness dishonestly to jump the queue.

Negative comments tended to focus on affordability issues:

I pay £900 per month (minus council tax, water, electricity, gas) for a small cramped studio. How on earth am I supposed to pay off all my bills and still manage to live, travel to work or hospital or survive on this...?

Comments and suggestions made by respondents (officers responses below in bold)

1. Higher priority should be given to households who are in work, rather than just those who meet the prevention criteria. Example comments included:

I feel that working families have been given a raw deal over the years as they are not seen as high priority because they are honest working people but due to the current housing crises especially where the private housing is so volatile I think there should definitely be more affordable housing through the council/housing association for working families. They have to show they have worked in the borough. No work, go live elsewhere. Yes- there should be a strict requirement that all applicants should have been in employment for at least three of the past five years and have contributed to the tax/ni System. There should be greatest possible emphasis on addressing the needs of those who try to keep working at lowest paid jobs and fend for themselves to stay near family support which is in Croydon and not be overtaken by those who do not or are from out of borough

The current – and the proposed – housing allocations scheme rewards applicants who are working by giving them additional priority. Applicants falling into band 3 and in employment or in a qualifying training programme are moved into band 2 under the current policy. This will not change. It is not possible to require every applicant to be working. The law specifies certain categories of people to whom the council must give reasonable preference to in its allocations policy.

2. The proposal will mean that households that stay with their families or extend their accommodation, who are not therefore homeless or in housing need will get priority. Example comments include:

*Those engaging with Gateway services who are assisted into private accommodation should not get any priority on the waiting list as they no longer have a housing need. If they have accepted a property, why should they get social housing as well?
If people have found a place in the private sector why don't they stay there? Do they need a council home?*

The extra priority will only be available to applicants who find themselves facing homelessness and this has been verified by staff in the Gateway service. These applicants may well choose to stay in this accommodation and withdraw their housing register application. However the focus of this new policy is on reducing the costs of temporary accommodation by encouraging people to help themselves.

3. The proposal will encourage households who would not otherwise come to the council and would find their own housing solution to approach the council to sort out accommodation, in order to receive an additional priority on the housing register. This will create additional demand from people that would otherwise have helped themselves. Example comment:

I don't understand what the council are trying to do here. Surely if you have secured private accommodation the council should say they no longer have a duty to house you.

The council has rigorous tests in place that are applied in order to ensure that applicants are genuinely homeless. Where an applicant has colluded with a landlord or family member, or engineered their own homelessness, they will be disqualified from the housing register altogether.

4. The proposal takes no account of individual circumstances and the capacity of different people to help themselves and find a solution, e.g.

It will advantage some, who have the option to return to live with family and friends, whilst those who do not, will not be able to get the additional priority

If, for example, a person has a poor credit rating, how can they apply for private rent? If the person is not working where will they find the funds to go private and which private landlords or agencies will accept them?

In my present situation I cannot stay in my flat because the landlord is selling the property to developers so what I think on the matter doesn't really count because I will be homeless regardless

If someone can show after speaking to them, that they have tried to prevent homelessness but do not fall into your criteria, then I think that they should be considered. I think each case needs to be decided based on its circumstances, family make up and needs.

Depending on each person circumstances and reasons for homelessness should always be considered.

There are a number of ways that an applicant can attract the additional priority; it is not simply dependent on them securing private rented accommodation. For example, they may be able to stay with family or friends. In all cases, applicants will be supported by staff in the Gateway service, who will work with them to explore all alternative housing options. Where more support is needed the council will work closely with specialist agencies.

Consultation sessions

To support the consultation survey, and to provide more in-depth, qualitative feedback on the

proposals, a number of additional face to face and telephone discussions have been conducted with key stakeholders, including:

- consultation meetings with homeless households in temporary accommodation
- staff engagement including stakeholder sessions with staff in adults social care and children's services
- meetings with and calls to voluntary sector organisations and representatives
- calls to registered providers

In addition, the proposal is being presented to the Streets, Environment and Homes Scrutiny Sub-committee for their views.

These sessions have been of particular value in understanding the potential issues for and impact on certain key groups, including older people, people with disabilities, young people and BME households. They have also provided an opportunity for a fuller discussion of issues with partner organisations. The responses are summarised below.

Housing applicants

A total of 32 households, currently residing in emergency / temporary accommodation, were consulted on some of the proposed changes to the scheme and the letting process. The households included were mainly families with children, including lone parent families, mostly falling between the ages of 20 and 50 years.

Homelessness prevention

Most of those interviewed were not aware of the Gateway service. But this is not surprising as the service is not externally branded as such. Households were asked how this proposal might have affected them. Just under half thought that it would or might have led to a different outcome. The difficulty in accessing private rented accommodation due to its affordability, the lack of a deposit or lack of suitable accommodation to meet their needs was highlighted by some, e.g.

*No, had arrears from paying accommodation storage costs, so wouldn't accept it
Deposit and rent in advance was a problem, otherwise I would have been very happy to go into private rented. No body mentioned it.*

Because I was evicted no estate agents would accept me despite previous references. Went into B&B for 2 months before TA

No, I was desperate to move into private rented, but just couldn't find anything

No, we were severely overcrowded, landlord served notice and would not negotiate an extension to tenancy

Private sector not suitable, have 6 children, 1 with a disability

Others said that increased incentives and support to prevent homelessness may have helped them to negotiate with family, friends, or former landlords to stay for longer or to arrange accommodation in the private rented sector to avoid B&B, e.g.

Yes, would have enabled me to stay with previous landlord for an extended period of time

Yes, friend would have allowed extra time

This would have made a difference for me as B&B is not ideal, but could not have prevented me from becoming homeless

Online bidding & Internet Access

Whilst households were not directly asked their views on the proposal of introducing choice based lettings, several households made comments in support of it.

Households were asked about their ability to access the internet and their confidence in doing so. Of the 32 households, 91% were able to access the internet. Despite this, eight households stated that they would like assistance and support in using a new system, including some of those that were confident in using the internet.

Of those that were not confident in using the internet two of the households mentioned that their children were able to use the internet and they would look to them for support. Three of the four people who were not confident in using an online system were aged 47-50 years, suggesting that it is age-related. A further household member stated that his parents (the applicants) did not speak English, and therefore they would find using an online system difficult. (The household was Turkish).

The vast majority of households accessed the internet via their phone, therefore it is important to ensure that any new CBL system is easy to access and use on smart phones. The ability to access free wi-fi was also important for households; many stated that they currently had free access in their temporary accommodation.

Registered Providers

Partner housing associations were invited by email to respond to the online consultation survey; four responses were received from this group. In addition, a number of telephone interviews were carried with housing associations with significant stock levels in Croydon, or with specialist interests (for example, providers of retirement housing). Overall, housing associations were supportive of both sets of proposals.

In terms of the proposal to increase the residency qualification to three years, a number commented that they were working with other local authorities that had introduced a five-year qualification, and so they felt that Croydon was being reasonable and pragmatic. All respondents supported the proposal. Additionally, there was overall support for the proposed exceptions to the three year residency qualification. One provider of retirement housing commented that they were pleased to see that older people wishing to move into sheltered or special sheltered housing would not need to meet the proposed 3 year rule; in their experience a number of applicants for these schemes were returning to the area to receive support from family members after a spell living away from Croydon.

In terms of the proposal to give additional priority to homeless households who work with the council to prevent their homelessness, there was overall support for this proposal. In the telephone interviews that were carried out, colleagues within housing associations were aware of the pressures on local authorities to tackle increasing numbers of people living in temporary accommodation, and the associated costs of this.

Young people

Feedback was provided by the director of CAYSH, a voluntary organisation that works with young people under the age of 25, often care leavers.

CAYSH are very supportive of the three year residency requirement and agree this reflects an appropriate period of time in which young people could be considered settled in Croydon. A number of the proposed exceptions relate to CAYSH clients, e.g. vulnerable care leavers, young people in supported housing and rough sleepers. They are pleased to see these included. Their expectation was that there would be joint discussions / assessments with the Council where clients fall into these categories. There are already many interactions between CAYSH and the housing options service over cases where there is a shared interest.

They are supportive of the proposal to introduce incentives for young people who work with the Council to prevent homelessness because they recognise that temporary accommodation is not the best place for people to be. However, they want Gateway staff to be aware of some of the potential risks around young people and care leavers who may be vulnerable and end up in accommodation where there might be a risk. They are keen to explore with the Council whether vulnerable clients moving into any accommodation that might potentially present a risk could be linked to floating support.

The risk and safeguarding issues highlighted will be picked up in training staff training within the Gateway service. The council will also ensure Gateway staff work closely with other agencies such as CAYSH, to ensure a 'total' service for young people which includes potential referrals for floating support.

Older people

A focus group meeting with Age UK took place. Age UK provides advice, support and outreach services to older people aged 50 and above.

Residency qualification

- It will make it more difficult for older people currently living out of the borough to apply for social housing in Croydon to be closer to family, e.g. to get support – but good to see that the proposal does make an exception for older people applying for older persons or special sheltered housing.
- Some concern that older people who are Croydon residents and go to stay with family out of the borough for a period in order to recuperate or recover from ill-health will lose their ability to apply for social housing.
- Similarly there are some cases of older people moving out of the borough after retiring who then return after 6 months because it hasn't worked out.

Homelessness Prevention

- Safeguarding issues – important to ensure that older people do not feel pressured to move to or return to inappropriate or abusive situations in order to prevent homelessness. This is a staff training issue.

Choice-based lettings

- Giving people more choice is a positive step compared to limited offers
- Would like to see adapted home presented with more specific details, especially exact width of doors and any steps, which can be critical for people using mobility vehicles and wheelchairs. This would be very enabling and inclusive and help avoid refusals
- Older people (and organisations representing them) should be provided with information on all the places they can go for support before the system goes live, e.g. libraries, CAB, One Support.
- Some other support providers for older people that could be engaged, e.g. health visitors for older people, linked to surgeries and new Personal Independence Coordinators for over 60s. Age UK is not currently commissioned by Croydon Council to provide housing advice.
- An auto-bid feature which generates bids automatically for suitable properties would be a good solution for some older people, e.g. those who are housebound and lack family support to assist, plus a system to identify and make contact with people who have not made any bids.
- Age UK conducts outreach visits and could assist some older people without access to a computer or an email address, if they take tablets out on visits (they don't currently do this). But they could only provide one-off support and not ongoing assistance with bidding.
- Many older people will have family who can help with bidding. Given resource limitation, should focus casework on those who absolutely have no access to online services.

People with learning disabilities

Summary of comments provided by Key Ring, a voluntary sector organisation that provides shared accommodation and support for people with learning disabilities.

Residency qualification

In general agreement with proposal, which is not seen to have a negative impact on people with disabilities, especially as there is an exception for people placed in supported housing.

Homelessness Prevention

The proposal was supported, but with some concern about that private rented accommodation would not be an appropriate solution for some people. For people with learning disabilities, they would be concerned about safeguarding and risk issues. Whilst not ruling out private rented accommodation, in most cases they believe that social housing landlords are better equipped to manage tenancies involving vulnerable people.

Choice-based lettings

Although the formal consultation did not cover this, a lack of choice for people in the allocation of properties under the current system was identified as an issue. This has led to people with learning difficulties ending up concentrated in certain parts of the borough and potential exploitation issues arising from this. A choice based lettings system that gives people more freedom to choose where they live would be a positive step.

In terms of the potential difficult for some people with learning disabilities to access and use an online bidding system, Key Ring think that through a combination of training and support, any disadvantages could be overcome. Key ring staff, for example, would assist people by talking them through the system to enable them to use it and, if needed, by sitting and doing it jointly with them. Key Ring engages with people with learning disabilities by providing a support service and through managing supported accommodation for people who will need long-term rehousing as they become more independent.

There are a number of support services that could assist people with learning disabilities, such as the Council's SNAP service and Hestia, another support provider. But contact and sign-posting arrangements should be identified and publicised prior to the launch of choice based lettings.

BME households

Views of the chief executive of the BME forum. The BME forum works alongside agencies that support single people and families.

Residency qualification

Supportive of an increase in the residency qualification but consider that two years is probably sufficient for people to establish a strong another connection to the borough: "people are already settled in a year, in 2 years they are completely settled".

Homelessness Prevention

There was strong support for giving additional priority to people who work with the council to prevent their homelessness, recognising that "it's very important to keep people out of B&B and other temporary accommodation". There were no particular concerns or issues about the proposal, in terms of potential disadvantage for BME households.

APPENDIX 2: ENGAGEMENT REPORT

Changes to our housing register rules and priorities

Report on the outcome of the engagement survey 14 June - 10 July 2016

Introduction

In March 2016, the council's Cabinet approved a programme of consultation on proposed changes to the council's housing allocations scheme. The proposed changes, in brief were:

- To increase the residency qualification from 1 to 3 years
- To increase priority to applicants that actively prevent their homelessness
- To introduce choice based lettings

Under s.168 of the Housing Act 1996, when a council makes a major alteration to the Allocations Scheme, the council should bring the effect of the alteration to the attention of those likely to be affected by it.

An initial online engagement process was launched on 14 June, running for 4 weeks. The analysis below is based on a total of 230 responses. Of these, 186 were from residents of the borough, 24 from people working for the Council or other service providers and 11 from business and community organisations. Three quarters of respondents were female and just under half were from BME groups. Respondents were broadly distributed across the different age bands. 23 of the respondents (10%) stated that they had a disability

Proposal 1. Increase the residency qualification from 1 to 3 years

What do you think of the proposal that people must have lived in the borough for 3 years before they qualify to go on to the waiting list?	Agree	Should be more than 3 years	Disagree	Other	Total
Number	150	36	25	8	219
Percent (%)	69%	16%	11%	4%	

The majority of respondents agreed that the residency requirement should be increased to three years. A minority thought it should be extended to a longer period.

What impact do you think this change will have on you?	Positive	Negative	Not affected	None, but will help others	None, but fairer overall	None but more sustainable communities	Other	Total
	41	3	76	17	23	9	29	198
	21%	2%	38%	8%	12%	5%	15%	

A majority of respondents thought this proposal would not impact directly on them. Some respondents answered by citing wider benefits such as increasing rehousing opportunities and greater fairness. Very few respondents thought the proposal would have a negative impact on them.

A common comment was that the council should consider the need for exceptions for certain people with a genuine and urgent need, e.g. people fleeing violence, young care leavers, ex-service personnel and vulnerable people who may be transient or have been placed out of the borough for a period. There might also be other circumstances where people have strong connections to the borough through sustained work or family.

Some respondents raised questions about how the council would monitor and check the length of time people had lived in the borough in order to stop fraud. There were also a few comments about rewarding certain behaviour, e.g. people actively solving their own accommodation needs, and those actively finding and sustaining employment.

For current applicants on the housing register, most considered the change would make little or no difference as they were long-term residents of the borough, but some thought it might speed up their rehousing.

Alternative suggestions were mostly about awarding priority to certain groups and freeing up more homes, rather than about the residency qualification:

- A minimum age, e.g. 25, before you can join the housing register
- Giving greater priority to employed households
- Giving greater priority to children with parents living long-term in the borough
- Giving priority for social housing to households staying in PRS for 3 or more years
- Giving priority to applicants who make a contribution - financial, voluntary, community
- Providing more cheap loans and help with deposits to enable access to PRS accommodation
- The council should buy and reuse abandoned and empty homes and offices
- Tenants under-occupying homes should be compelled to move to smaller homes

Proposal 2. Increase priority to applicants that actively prevent their homelessness

What do you think of the proposal to award a higher priority on the housing register, to people that work with the Gateway service and prevent their homelessness?	Agree	Agree with some concerns	Disagree	Don't understand Gateway service	Other	Total
	101	40	29	4	13	187
	54%	21%	16%	2%	7%	

Again, most respondents agreed with the proposal. But some of these expressed reservations and concerns about how the proposal would work. A small number of respondents said they did not understand the Gateway service and some were under the impression that Gateway staff or other Council staff would receive priority for housing under this proposal. Households that ‘work with the council’ may benefit, but not people that work for the council.

What impact do you think this change will have on you?	Positive impact	Negative impact	Not affected	Positive impact but some concerns	None, but wider benefits perceived	Other	Total
	23	16	90	8	17	14	168
	14%	10%	54%	5%	10%	8%	

Most respondents thought this proposal would have no impact on them personally. More thought it would have a positive impact than negative, although some raised concerns or questions about how it would work in practice.

The most common concerns were:

- It depends on adequate and affordable alternatives to council housing being provided
- It needs to be managed carefully with good quality support provided by well-trained, sympathetic staff
- The council needs to clarify what constitutes working with the Gateway service to prevent homelessness – clear criteria and an understanding of expectations are needed
- Some vulnerable people may struggle to engage and meet expectations
- There needs to be a careful, joined up approach to care leavers and other vulnerable groups

For people that disagreed with the policy the main reasons given were:

- Applicants should be treated on the basis of need and priority, rather than engagement
- It will simply force people into unaffordable, insecure, unsustainable private rented accommodation which is not a long-term solution for many households
- It won't solve the housing problem; the council needs to do more to provide social housing or people will just end up homeless again
- Social housing should be reserved for people facing long-term conditions such as disability not a reward for people that engage with the council
- Some people will not be helped by Gateway service and will have no solution to their homelessness

A common theme for respondents was the view that private rented accommodation was not

a solution. One respondent commented: ‘people just end up going round and round in a vicious circle of high rents, inadequate money, eviction and homelessness’. Many felt that poor conditions and high rents in the private rented sector made it increasingly inaccessible and unsustainable even for people in employment. Landlords unwilling to accept benefit claimants and deposits and rent in advance were cited as problems. It was suggested that the council should find ways to work with landlords to reduce rents, increase access, and improve security of tenure and conditions.

Alternative suggestions to this proposal included:

- Build more housing including shared accommodation
- Provide people in private rented accommodation with the same support as in social housing – a dedicated housing officer, financial inclusion support
- A scoring system for people's engagement with the service that also recognises people's ability or not to engage if they are vulnerable
- Housing staff to take on a greater corporate parenting role working with and not against social care
- Increase community-based support systems for at risk tenants to prevent homelessness
- Help people to move to more affordable areas
- More help and support from the council before the stage at which bailiffs evict
- Refuse assistance/evict from temporary accommodation people that don't engage

Proposal 3. Introduce choice-based lettings

What do you think of the proposal to introduce choice based lettings in Croydon?	Agree	Agree with some concerns	Disagree	Did not understand proposal	Other	Total
	120	19	25	7	10	181
	66%	11%	14%	4%	6%	

Support for introducing a choice-based lettings system was strong with over three quarters of respondents in agreement with this proposal. Some of those that agreed also raised concerns, typically about how more vulnerable people and those with less ability to get online might be disadvantaged. Some referred positively to the operation of choice-based lettings in other boroughs and felt it was long overdue in Croydon. However some were sceptical or unclear how this would work. Six respondents stated that they would prefer the local authority to retain its traditional allocations role.

What impact do you think this change will have on you?	Positive impact	Negative impact	Not affected	None but wider benefits perceived	Not sure	Other	Total
	47	10	66	12	14	12	161

	29%	6%	41%	8%	9%	8%	
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Among those who thought they would be affected by the proposal, most thought it would have a positive impact, citing quicker rehousing, more choice and control and a greater likelihood that they would be happy with the property they were allocated. Some of the concerns that were raised about the proposal included:

- Weak, vulnerable, people unable to get online and those with less time (families and those in busy jobs) will lose out to more assertive, IT capable people
- Support with bidding and getting online is crucial
- It may give people false hope - people can bid for years and get nowhere resulting in frustration
- How will the council prevent people bidding for wrong sized properties
- How will vulnerable people including those with severe medical problems and people lacking internet access manage

For those that disagreed with the proposal, the main reasons given were:

- It is unworkable due to an overall shortage of homes
- It is the council's responsibility to allocate housing fairly rather than shifting responsibility to applicants
- People in urgent need should accept what they are allocated
- The council should manage and improve the current allocation scheme
- Less chance of getting a property compared to the current system which allows a maximum of two choices only
- It is unfairly based on the ability to afford to make bids

The last comment suggests that some people were confused by the term 'bidding', thinking that there might be a monetary element to this.

Some alternative suggestions included the following:

- Restricting Right to Buy sales and the ability of higher incomes households to hold tenancies in order to increase the availability of social homes
- Retaining the waiting list system with people able to specify preferences and allocated properties in line with priority
- Limiting options to bid - 3 bids in total
- Allocating properties based on each household's circumstances.
- Providing a phone help line

APPENDIX 3. FULL EQUALITY ANALYSIS

Croydon Council Equality Analysis Form

Stage 1 Initial Risk Assessment - Decide whether a full equality analysis is needed

At this stage, you will review existing information such as national or local research, surveys, feedback from customers, monitoring information and also use the local knowledge that you, your team and staff delivering a service have to identify if the proposed change could affect service users from equality groups that share a “protected characteristic” differently. You will also need to assess if the proposed change will have a broader impact in relation to promoting social inclusion, community cohesion and integration and opportunities to deliver “social value”.

Please note that the term ‘change’ is used here as shorthand for what requires an equality analysis. In practice, the term “change” needs to be understood broadly to embrace the following:

- Policies, strategies and plans
- Projects and programmes
- Commissioning (including re-commissioning and de-commissioning)
- Service Review
- Budgets
- Staff structures (including outsourcing)
- Business transformation programmes
- Organisational change programmes
- Processes (for example thresholds, eligibility, entitlements, and access criteria)

You will also have to consider whether the proposed change will promote equality of opportunity; eliminate discrimination or foster good relations between different groups or lead to inequality and disadvantage. These are the requirements that are set out in the Equality Act 2010.

1.1 Analysing the proposed change

1.1.1 What is the name of the change?

Engagement and consultation on proposals to amend the Council’s Housing Allocations Scheme

1.1.2 Why are you carrying out this change?

Please describe the broad aims and objectives of the change. For example, why are you considering a change to a policy or cutting a service etc.

Local housing authorities have a statutory responsibility to publish a housing allocations scheme under the Housing Act 1996 (as amended). The housing

allocations scheme should provide applicants for housing with a clear understanding of:

- How to make an application for housing to the local housing authority
- How the local authority will process their application and assess their needs
- The priority their application will get under the scheme
- The length of time the applicant is likely to have to wait before they receive an offer of affordable housing
- How complaints and reviews are dealt with under the scheme

Social housing is provided to assist people that cannot afford to rent or buy suitable market housing. Applicants that are homeless, have a medical need or disability, are living in poor quality accommodation or are overcrowded, and those needing to move on welfare or hardship grounds should be given a “reasonable preference” for social housing by local housing authorities in their housing allocations schemes.

In Croydon, as in many other places in London and the South East of England, there is not enough social housing to meet existing housing need. The housing allocations scheme sets out how the council makes the difficult decisions about which applicants on the housing register should be offered social housing. A report to Cabinet in March 2016 detailed the increasing demand on social housing in Croydon, particularly as a result of rising levels of homelessness, and proposed to make changes to the allocations scheme. Croydon’s housing stock has a smaller proportion of social housing than other London boroughs (17% of the overall stock is social housing) to meet demand. Market housing for sale and rent is becoming increasingly expensive, and housing benefit further restricted in terms of the level of rent it will cover (compared to the average market rent). Homelessness continues to be a pressure for Croydon Council. 1006 applications were accepted by the Council in 2015/16 with the main housing duty, which is an increase of 126 on the previous year.

The Council was accommodating 2918 households in temporary accommodation (TA), at the end of March 2016, with around 800 in emergency bed and breakfast (shared and self-contained). In 2015/16 the Council spent more than £4.m (net) on providing temporary accommodation, compared to £1.8m in 2010/11. As well as these financial costs, there are wider social costs resulting from time spent in temporary accommodation to health, educational attainment and to successful and sustainable employment.

The Localism Act 2011 has given local authorities greater control over who they admit to waiting lists for social housing in their area. The Council’s proposal involves amending the existing scheme in the following ways:

- I) To increase the current residency qualification from 1 to 3 years;
- II) To introduce a homelessness prevention priority for homeless applicants who work with the Council’s Gateway and Welfare Service to prevent their homelessness; and
- III) Introduction of an online bidding system for choice based lettings.

I) The overall objective is to ensure applicants for social housing residency can prove a close association with Croydon, particularly given the continued high pressures on social housing set out above. Social housing is a scarce resource and we want to make sure it is available to local people who would find it particularly difficult to find a

home on the open market. The Council believes a 3 year residency qualification falls in line with the governments strong encouragement set out in the statutory guidance for all housing authorities to adopt a residency qualification of **at least two years.**

II) The Council wants to encourage households to work with its Gateway and its Housing Needs Service to prevent homelessness, as well as reduce any perceived advantage in applying as homeless as a quicker way of obtaining social housing. The Council also considers the “prevention priority makes the scheme fairer overall for all applicants; as well as more transparent and easier to understand for tenants, staff, Council members and stakeholders.

III) The Council wants to offer applicants a more active role in choosing their home rather than allocating homes on the basis of need, with little ability to refuse the home they have been offered. This way, people will have made a more active commitment towards the home and community they will live in.

1.1.3 What stage is your change at now?

See **Appendix 1** for the main stages at which equality analyses needs to be started or updated.

The proposal is at an early stage, the initial approval to consult was approved by Cabinet in March 2016. The Council wants to engage with a wide range of stakeholders in advance of formal consultation in order to hear their initial views and make any amendments that may be required as a result.

Please note that an equality analysis must be completed before any decisions are made.

If you are not at the beginning stage of your decision making process, you must inform your Director that you have not yet completed an equality analysis.

1.2 Who could be affected by the change and how

1.2.1 Who are your internal and external stakeholders?

For example, groups of council staff, members, groups of service users, service providers, trade unions, community groups and the wider community.

Internal stakeholders (Senior Officers, and front line officers)

- Housing Needs
- Gateway and Welfare Services
- Children Family, Family Intervention and Childrens Social Care
- Access Croydon
- People – Adult Services (with responsibility for providing accommodation to vulnerable people, people with learning disabilities, people with mental health problems, and older people)

- SCC – Strategy and Community leads

Members

- Cabinet Members and Shadow Cabinet Members responsible for social housing
- Members of the Health, Streets, environment and housing Scrutiny Sub Committee
- Ward Members (all wards)

Members of Parliament

- MPs for Croydon’s three parliamentary constituencies

External stakeholders

- Registered providers of social housing
- Local statutory agencies
- Council tenants and leaseholders groups
- Local residents associations
- Local voluntary and community groups
- Faith Organisations
- Neighbouring boroughs

1.2.2 What will be the main outcomes or benefits from making this change for customers / residents, staff, the wider community and other stakeholders?

The outcomes anticipated from the proposals outlined would be:

- A more transparent and fairer housing allocations scheme
- A housing allocations scheme more closely aligned to current statutory guidance and gives priority to local people in the greatest housing need in Croydon
- Social housing allocations are directed to households in housing need with a proven strong association with the borough
- More households work with the Gateway and Housing Needs Service to prevent homelessness
- The number of households in temporary accommodation is reduced

1.2.3 Does your proposed change relate to a service area where there are known or potential equalities issues?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. If you don't know, you may be able to find more information on the Croydon Observatory (<http://www.croydonobservatory.org/>)

Yes.

Housing applicants are more likely to be female, young and from a BME group than the general population, as are homeless applicants. These groups are identified in previous but relatively recent equalities analysis carried out by the Department for Communities (on proposals to do with homelessness in the Localism Bill), and by the Council (in previous amendments to the Housing Allocations Scheme) and in other

reports produced by the Council (see 2.1).

1.2.4 Does your proposed change relate to a service area where there are already local or national equality indicators?

You can find out from the Equality Strategy <http://intranet.croydon.net/corpdept/equalities-cohesion/equalities/docs/equalitiesstrategy12-16.pdf>). Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

Yes.

National Indicators

Information on housing activity and homelessness is provided to the government on a quarterly basis (annually for housing register and lettings information) and published on the www.gov.uk website.

These include:

- Homeless applications and acceptances
- Reasons for homelessness
- Households in temporary accommodation
- Households on the housing waiting list
- Social housing lettings

Local Indicators

The proposed change relates to the objective below in the council's Equality and Inclusion Policy (2016-2020)

Housing: To increase the support offered to people who find themselves in a position where they are accepted as homeless especially those from BME backgrounds and women

1.2.5	Analyse and identify the potential <u>advantage</u> or <u>disadvantage</u> associated with the change that will be delivered for stakeholders (customers, residents, staff etc.) from different groups that share a “protected characteristic”
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Please see Appendix 2 (section 1) for a full description of groups.

I.) Increasing the residency qualification to 3 years

	Potential advantage 😊	Potential disadvantage ☹️
Disability	No potential advantage has been identified	Households including someone with a disability and newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years
Race/ Ethnicity	BME households are overrepresented on the housing register compared to the general population. BME households living in Croydon for 3 or more years should benefit from the greater chance of an allocation of social housing provided by restricting qualification criteria in relation to residence.	BME households newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years.
Gender	Female lone parents are overrepresented among homeless households and housing applicants. Female headed households living in Croydon for 3 or more years should benefit from the greater chance of an allocation of social housing provided by restricting qualification criteria in relation to residence.	Female headed households newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years.
Transgender	No potential advantage has been identified	No potential disadvantage has been identified
Age	Homeless households tend to be younger than the general population and therefore younger people living in Croydon for 3 or more years should benefit from the greater chance of an allocation of social housing provided by restricting qualification criteria in relation to residence.	Younger households newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years.

Religion /Belief	No potential advantage has been identified	No potential disadvantage has been identified
Sexual Orientation	No potential advantage has been identified	No potential disadvantage has been identified
Pregnancy and Maternity	No potential advantage has been identified	Households including someone who is pregnant and newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years
Social inclusion issues	No potential advantage has been identified	No potential disadvantage has been identified
Community Cohesion Issues	No potential advantage has been identified	No potential disadvantage has been identified
Delivering Social Value	No potential advantage has been identified	No potential disadvantage has been identified

II.) To introduce a homelessness prevention priority for homeless applicants who work with the Council's Gateway and Welfare Service to prevent their homelessness

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	No potential advantage has been identified	There may be an impact on some groups of disabled people who may be less able to find a solution to prevent their homelessness. This would be mitigated by providing intensive support via the Gateway service and linking in with other support services. This would include arranging specialist accommodation, where possible, as a means of preventing homelessness.
Race/ Ethnicity	BME households living in Croydon are overrepresented on the housing register compared to the general population and among homeless households and will benefit from the greater priority for an allocation of social housing provided by the homelessness prevention priority.	There may be an impact on BME households for whom language issues are a barrier to arranging their own accommodation. This would be mitigated by ensuring that language assistance is provided.
Gender	Female headed households are overrepresented among homeless households and	No specific impact has been identified on the information available

	among housing applicants. Female headed households should benefit from the greater priority for an allocation of social housing provided by the homelessness prevention priority.	
Transgender	No potential advantage has been identified	No potential disadvantage has been identified
Age	Homeless households tend to be younger than the general population and therefore younger people should benefit from the greater priority for an allocation of social housing provided by the homelessness prevention priority.	No potential disadvantage has been identified
Religion /Belief	No potential advantage has been identified	No potential disadvantage has been identified
Sexual Orientation	There is some evidence nationally that young LGBT people have a higher rate of homelessness and therefore should benefit from the greater priority for an allocation of social housing provided by the homelessness prevention priority	No potential disadvantage has been identified
Pregnancy and Maternity	No potential advantage has been identified	No potential disadvantage has been identified
Social inclusion issues	No potential advantage has been identified	No potential disadvantage has been identified
Community Cohesion Issues	No potential advantage has been identified	No potential disadvantage has been identified
Delivering Social Value	No potential advantage has been identified	No potential disadvantage has been identified

III.) Introduce a choice based bidding system

	Likely Advantage 😊	Likely Disadvantage ☹️
Disability	Ability to exercise choice over type and location of property to be considered for	<p>Potential disadvantage towards People with a disability accessing a predominantly online service, e.g. people with learning disabilities.</p> <p>This impact can be mitigated through providing support to households including someone</p>

		<p>with a disability to enable them to access the service, navigate the bidding system, have sufficient time to bid, and make an informed choice about where they wish to live. This support can be provided in partnership with the VCS, other partners and stakeholders.</p>
Race/ Ethnicity	Ability to exercise choice over type and location of property to be considered for	<p>BME households living in Croydon are overrepresented among homeless households compared to the Croydon's general population and homeless households are more likely to have choice restricted and receive more direct offers as a result.</p> <p>This impact can be partially mitigated by enabling homeless households to participate in choice-based lettings for a period of time before direct offers are made and also through effective monitoring and responses to appeals and reviews, ensuring suitability of the accommodation offered is rigorously monitored and implemented, and encouraging homelessness prevention.</p> <p>There may be an impact on BME households for whom language issues are a barrier to understanding and using the online bidding system.</p> <p>This would be mitigated by looking at the potential to provide a translation function as part of the system.</p>
Gender	Ability to exercise choice over type and location of property to be considered for	<p>Female lone parents are overrepresented among homeless households compared to Croydon's general population and are more likely to have choice restricted and receive more direct offers as a result.</p> <p>This impact can be partially mitigated by enabling homeless households to participate in choice-based lettings for a period</p>

		of time before direct offers are made and also through effective monitoring and responses to appeals and reviews, ensuring suitability of the accommodation offered is rigorously monitored and implemented, and encouraging homelessness prevention.
Transgender	No potential advantage has been identified	No potential disadvantage has been identified
Age	Ability to exercise choice over type and location of property to be considered for	<p>Younger people are overrepresented among homeless households compared to the Croydon's general population and are more likely to have choice restricted and receive more direct offers as a result.</p> <p>This impact can be partially mitigated by enabling homeless households to participate in choice-based lettings for a period of time before direct offers are made and also through effective monitoring and responses to appeals and reviews, ensuring suitability of the accommodation offered is rigorously monitored and implemented, and encouraging homelessness prevention.</p>
Religion /Belief	No potential advantage has been identified	No potential disadvantage has been identified
Sexual Orientation	No potential advantage has been identified	No potential disadvantage has been identified
Pregnancy and Maternity	No potential advantage has been identified	No potential disadvantage has been identified
Social inclusion issues	No potential advantage has been identified	No potential disadvantage has been identified
Community Cohesion Issues	Ability to exercise choice over type and location of property should improve community cohesion and tenancy sustainment	No potential disadvantage has been identified
Delivering Social	No potential advantage has been	No potential disadvantage has

Value	identified	been identified
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1.2.6 In addition to the above are there any other factors that might shape the equality and inclusion outcomes that you need to consider?

For example, geographical / area based issues, strengths or weaknesses in partnership working, programme planning or policy implementation

Housing and homeless applicants coming to the borough from other parts of London will be negatively affected by the proposals.

1.2.7 Would your proposed change affect any protected groups more significantly than non-protected groups?

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response. For a list of protected groups, see Appendix.....

I.) The Council is proposing to amend its allocations scheme to require applicants to have lived in Croydon for at least 3 years before they qualify to go on the housing register.

No. This amendment should not disproportionately affect protected groups in Croydon more than others. Although some protected groups (females, BME communities, lone parents) are over-represented among housing applicants on the waiting list and among homeless applicants compared to the general population of Croydon, the change will not significantly impact on these groups more than others.

Some specific protected or vulnerable groups that might have been impacted by the change, such as young people leaving care and those with support needs (Including some disabled people) who have been placed in supported accommodation outside of the borough will be exempt from the 3 year residency requirement. It is also proposed people who are fleeing violence, including domestic abuse, and those with a disability moving through the London-wide mobility scheme will not be disadvantaged by the proposal.

II.) The Council is proposing to amend its allocations scheme to introduce a new homelessness prevention priority which will give applicants that work with the council's Gateway & Welfare Service to prevent their homelessness a higher priority for social housing

No. The proposed change may encourage applicants to accept an offer of private rented accommodation to prevent homelessness immediately, with an offer of social housing being made later. This should mean household spending less time in bed and breakfast emergency accommodation, and longer term TA, with a reduction in the negative impacts on health, work, wellbeing and social exclusion as a result. Although BME households and young female lone parents are over-represented among homeless households it is not considered that the change will significantly impact on these groups.

III.) The Council intends to introduce a choice based lettings system which will enable online bidding for properties becoming available for let.

Yes. There is a potential risk that some people from protected groups may find an allocation system that relies on online bidding more difficult to access. Some people who are more reliant on non-digital channels such as face-to-face or telephone contact could be negatively impacted if alternative provision is not made. The change is likely to have a greater impact on some protected groups compared to non-protected groups, in particular, older people and people with a disability. Further analysis will be required to look at this impact and how it can be mitigated through providing support to affected households to enable them to access the service and use the bidding system, in partnership with the VCS, other partners and stakeholders.

The proposed change to a system of online bidding has the potential to impact more significantly on BME groups for whom English is not a first language

BME households and young female lone parents are over-represented among homeless households. Homeless households are less likely to benefit from this change as the Council will continue to apply a more limited level of choice and more direct offers to this group. However, as BME households and female lone parents are also highly represented among non-homeless housing applicants too, the impact of the change is not significantly more for people in race and gender protected groups. The impact of homeless households can be partially impacted though effective monitoring and responses to appeals and reviews, ensuring suitability of the accommodation offered is rigorously monitored and implemented, and encouraging homelessness prevention.

1.2.8 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in advancing equality of opportunity between people who belong to any protected groups and those who do?

In practice, this means recognising that targeted work should be undertaken to address the needs of those groups that may have faced historic disadvantage. This could include
a focus on addressing disproportionate experience of poor health, inadequate housing, vulnerability to crime or poor educational outcomes *etc.*

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

The proposed changes to the housing allocation scheme will not hinder the Council in advancing equality of opportunity between people who belong to any of the protected groups and those who do not. The proposals should help in promoting equality of opportunity in making the housing allocations scheme clearer and more transparent, and help dispel perceptions that it unfairly favours some groups at the expense of others.

1.2.9 As set out in the Equality Act, is the proposed change likely to help or hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic?

In practice, this means that the Council should give advance consideration to issues of potential discrimination before making any policy or funding decisions. This will require actively examining current and proposed policies and practices and taking mitigating actions to ensure that they are not discriminatory or otherwise unlawful under the Act

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response.

No. The proposed change should not hinder the Council in eliminating unlawful discrimination, harassment and victimisation in relation to any of the groups that share a protected characteristic. The proposal to introduce choice-based lettings has the potential to disadvantage some people who have less access or ability to use digital channels and these people are likely to be more highly represented among some groups that share a protected characteristic. But this will not result in or encourage discrimination towards these groups and mitigating actions are planned to ensure any potential for disadvantage is addressed.

1.2.10 As set out in the Equality Act, is your proposed change likely to help or hinder the Council in fostering good relations between people who belong to any protected groups and those who do not?

In practice, this means taking action to increase integration, reduce levels of admitted discrimination such as bullying and harassment, hate crime, increase diversity in civic and political participation etc.

Please answer either "Yes", "Don't know" or "No" and give a brief reason for your response

The proposed changes should not hinder the Council in fostering good relations between people who belong to any protected groups and those who do not. By promoting greater choice for people applying for social housing, to enable them to make positive decisions about where they live, and by addressing concerns among local residents that households recently moving into the borough may be rehoused more quickly, this may help to reduce tensions and foster good relations between people.

1.3 Decision on the equality analysis

If you answer "yes" or "don't know" to ANY of the questions in section 1.2, you should undertake a full equality analysis. This is because either you already know that your change or review could have a different / significant impact on groups that share a

protected characteristic (compared to non-protected groups) or because you don't know whether it will (and it might).

Decision	Guidance	Response
No, further equality analysis is not required	<p>Please state why not and outline the information that you used to make this decision. Statements such as 'no relevance to equality' (without any supporting information) or 'no information is available' could leave the council vulnerable to legal challenge.</p> <p>You must include this statement in any report used in decision making, such as a Cabinet report</p>	N/A
Yes, further equality analysis is required	<p>Please state why and outline the information that you used to make this decision. Also indicate</p> <ul style="list-style-type: none"> • When you expect to start your full equality analysis • The deadline by which it needs to be completed (for example, the date of submission to Cabinet) • Where and when you expect to publish this analysis (for example, on the council website). <p>You must include this statement in any report used in decision making, such as a Cabinet report.</p>	<p>The proposed changes could have an impact on groups that share a protected characteristic (compared to non-protected groups). The Council wants to ensure that people and organisations representing these groups will have the opportunity to comment on the proposals and to have their comments taken into account.</p> <p>The full equality analysis will begin in July 2016 and continue to September 2016, and the results of the engagement and consultation carried out will inform the equality analysis that will accompany the Cabinet Report on the outcome of the consultation in October 2016.</p>
Officers that must approve this decision	<p>Name and position</p> <p>Sharon Godman</p>	Date
Report author	Ian Stone, Senior Strategy Officer	
Director	Mark Meehan, Director Housing Needs	

Decision	Guidance	Response

1.4 Feedback on Equality Analysis (Stage 1)

Please seek feedback from the corporate equality and inclusion team and your departmental lead for equality (the Strategy and Planning Manager / Officer)

N/A

Name of Officer	-	-
Date received by Officer		-Please send an acknowledgement
Should a full equality analysis be carried out?		-Note the reasons for your decision

Stage 2 Use of evidence and consultation to identify and analyse the impact of the change

Use of data, research and consultation to identify and analyse the probable Impact of the proposed change

This stage focuses on the use of existing data, research, consultation, satisfaction surveys and monitoring data to predict the likely impact of proposed change on customers from diverse communities or groups that may share a protected characteristic.

Please see Appendix 2 (section 2) for further information.

2.1	<p>Please list the documents that you have considered as a part of the equality analysis review to enable a reasonable assessment of the impact to be made and summarise the key findings.</p> <p>This section should include consultation data and desk top research (both local and national quantitative and qualitative data) and a summary of the key findings.</p>
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Revised Housing Allocations Scheme EqIA Sept 2012 – The revisions to the scheme, following the Localism Act 2011, introduced a number of qualifications to go on to the housing register, including a 12 month residency requirement, reduced the number of housing offers from seven to two, and for homeless households, to one

offer only, and changed the assessment of reasonable preference for overcrowding, medical needs and applications made on welfare grounds. Overall, the assessment showed no potential for discrimination and that all appropriate opportunities had been taken to advance equality and foster good relations between groups.

Homelessness Strategy 2008 to 2013 EqIA – the EqIA sets out the main protected groups benefiting from homelessness activity as women, single people with support needs, young people, BME households, particularly Black African and Caribbean households, disabled people, older people, lesbian, gay, bisexual and transgender (LGBT) people.

Equalities monitoring of housing allocations report 2014/15 - As at March 2015, 68% of applicants on the waiting list were from BME groups. BME applicants represented 80% of applicants requiring larger homes. A waiting list snapshot taken in March 2015 found that 466 applicants were recorded as having a disability, representing 9% of the waiting list overall. Of these: 120 (26%) required wheelchair accommodation, 157 (34%) adapted accommodation, 91 (20%) were recorded having a housing need as a result of poor mental health, 67 as a result of a learning disability (14%), and 31 (7%) as a result of visual impairment.

Draft Homelessness Review 2015 – This provided detailed information on a number of groups with protected characteristics in relation to homelessness demand, summarized below:

Gender

More than 6 out of 10 homeless households are headed by a single female applicant

Age

Homeless applicants tend to be younger than the general population, with over half of homeless applicants aged between 25 and 44. Only 28 of applicants to the statutory homeless service (2% of all applications) were vulnerable due to old age

Ethnicity

Black and Black British households are overrepresented among homeless households. In Croydon, Black or Black British people make up 20.2% of Croydon's population as a whole but account for 46% of homeless households. 30% of homeless households are from a White ethnic background.

Households with children

More than 8 out of ten households accepted as homeless have dependent children

People with disabilities

The numbers of people accepted as homeless with physical or learning disabilities is relatively small compared to other groups

People with mental health problems

Homeless applicants with a priority need arising from vulnerability comprised 23% of all homeless applications in 2012/13. This compares with 17% in 2010/11. The majority (84%) of these applicants fell into three groups: vulnerability for medical reasons (30per cent), other special reasons (21%) and mental health (33%)

Engagement on changes to our housing register rules and priorities: Report on the outcome of the engagement survey 14 June - 10 July 2016 – 230 responses were received to this online engagement on the three proposals covered in this equality analysis. The following are the most relevant comments.

I.) A common response to this proposal was that the Council should consider the need for exceptions for certain people with a genuine and urgent need, e.g. people fleeing violence, young care leavers, ex-service personnel and vulnerable people who may be transient or have been placed out of the borough for a period. These exceptions have been considered and adopted within the current proposal.

II.) Some comments were received in relation to protected and vulnerable groups: some vulnerable people may struggle to engage and meet expectations and there needs to be a careful, joined up approach to care leavers and other vulnerable groups. The need for joint working between the Gateway service and council, other statutory and voluntary providers of support and care services, will be addressed through shared meetings.

III.) The engagement responses showed that there were some concerns about the ability of some groups to access and engage in the online bidding process, e.g.

- Weak, vulnerable, people unable to get online and those with less time (families and those in busy jobs) will lose out to more assertive, IT capable people
- Support with bidding and getting online is crucial
- Concern about vulnerable people including those with severe medical problems and people lacking internet access

Consultation: Have your say on the future of the Housing Allocations Scheme. Consultation August – September 2016 – consultation has been undertaken on two of the proposals: increasing the residency qualification to 3 years and introducing a homelessness prevention priority for homeless applicants who work with the Council's Gateway and Welfare Service to prevent their homelessness.

In addition to the online survey, the consultation sought specifically to invite the views of organisations representing vulnerable people and groups that share a protected characteristic. This included the BME Forum, Age UK, Keyring, Croydon Association for Young Single Homeless.

Concerning the proposed change to the residency requirement, the BME Forum indicated that they considered a period of two years to be appropriate. Some concerns were raised about older people wanting to move into the borough to be close to family or those moving out of the borough for a temporary period to stay with family, e.g. following illness. These have been considered in the drafting of the revised policy.

The priority to be given to homelessness prevention was strongly supported. The only matter raised concerned the need for staff to consider safeguarding issues and risks for vulnerable people.

The consultation usefully identified issues for some older and disabled people using the online bidding system and a number of suggestions were made for addressing this, which will be developed as part of the choice-based lettings implementation plan.

Details of this consultation can be found in the Consultation Report that has been produced.

2.2 Please complete the table below to describe what the analysis, consultation, data collection and research that you have conducted indicates about the probable impact on customers or staff from various groups that share a protected characteristic.

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
Disability		<p>Households including someone with a disability and newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years. However, there will be exceptions for people needing to move from supported housing and this group will not be significantly more impacted than other groups.</p> <p>Some people with a disability may be less able to access or engage with the online bidding system</p>	Consultation Research into Choice based lettings software systems
Age	Younger people are more highly represented among homeless households and should benefit from the greater priority for an allocation of social housing provided by the homelessness prevention priority. However, the impact is not considered to be significant compared to other groups.	<p>Older people may be less able to access or engage with choice-based lettings and proposed online bidding system</p> <p>Younger households newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years (with some exceptions for care leavers, those at risk of violence referred through approved routes and those coming from supported housing).</p>	Consultation Draft Homelessness Review Research into Choice based lettings software systems

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
		Overall, this group will not be significantly more impacted than other groups.	
Gender	Female headed households are overrepresented among homeless households and housing applicants and should benefit from the greater priority for an allocation of social housing provided by the homelessness prevention priority. However, as female headed households are also highly represented among non-homeless housing applicants the impact is not considered to be significant.	Female headed households newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years (with some exceptions for those at risk of violence including women fleeing domestic violence referred through the Family Justice Centre). Overall, this group will not be significantly more impacted than other groups.	Equalities monitoring of housing allocations Draft Homelessness Review
Race/ethnicity	BME households are over-represented among homeless households and housing register applicants and should benefit from the greater priority for an allocation of social housing provided by the homelessness prevention priority. However, as BME households are also highly represented among non-homeless housing applicants the impact is not considered to be significant.	<p>BME households for whom English is not a first language may have difficulty using the online bidding tool. This issue has been investigated and it has been established that the online bidding systems that would be used provide a built-in translation capability extending to a 100 plus languages. Translation services can also be provided where necessary. Therefore it is not considered that this change will have a negative impact on BME households</p> <p>BME households newly settled in Croydon will be disqualified from an allocation until they have lived in the borough for at least 3 years (with some exceptions for care leavers, those at risk of violence referred through approved routes and those coming from supported housing).</p>	Equalities monitoring of housing allocations Draft Homelessness Review Research into Choice based lettings software systems

Group's with a "Protected characteristic" and broader community issues	Description of potential advantageous impact	Description of potential disadvantageous impact	Evidence Source
		Overall, this group will not be significantly more impacted than other groups.	

2.3 Are there any gaps in information or evidence missing in the consultation, data collection or research that you currently have on the impact of the proposed change on different groups or communities that share a protected characteristic? If so, how will you address this?

Please read the corporate public consultation guidelines before you begin:
<http://intranet.croydon.net/finance/customerservices/customerserviceprogramme/stepbystepguide.asp>.

No, a series of focus group sessions and one to one conversations are underway with voluntary and community organisations. These will cover organisations representing older people, BME households, young people and people with disabilities. This will ensure that our understanding of the issues and of potential disadvantages for members of protected groups is as comprehensive as possible and that we discuss ways of mitigating these early in the process.

2.4 If you really cannot gather any useful information in time, then note its absence as a potential disadvantageous impact and describe the action you will take to gather it.

Please complete the table below to set out how will you gather the missing evidence and make an informed decision. Insert new rows as required.

Group's with a "Protected characteristic" and broader community issues	Missing information and description of potential disadvantageous impact	Proposed action to gather information
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Stage 3 Improvement plan

Actions to address any potential disadvantageous impact related to the proposed change

This stage focuses on describing in more detail the likely disadvantageous impact of the proposed change for specific groups that may share a protected characteristic and how you intend to address the probable risks that you have identified stages 1 and 2.

3.1 Please use the section below to define the steps you will take to minimise or mitigate any likely adverse impact of the proposed change on specific groups that may share a protected characteristic.

Equality Group (Protected Characteristic)	Potential disadvantage or negative impact e	Action required to address issue or minimise adverse impact	Action Owner	Date for completing action
Disability	Disabled people may be less able to access or engage with online bidding system	<p>An implementation plan will be developed to include the following elements:</p> <ul style="list-style-type: none"> • Supporting users to acquire digital skills, e.g. by engaging with third parties who can provide digital assistance to disabled people, e.g. through Croydon Disability Forum • Helping applicants who cannot easily get online, e.g. by providing mobile phone interface and through libraries and other public services 	Head of Housing Solutions	Prior to implementation of choice-based lettings

		<p>where online services and support and assistance can be accessed</p> <ul style="list-style-type: none"> • Providing face to face and telephone support for individuals unable to engage with the online bidding system, e.g. personal assistance at Access Croydon • Training support staff, including social workers, day centre and care staff to provide one to one assistance and support. • Setting up systems that prevent people from being disadvantaged, e.g. by enabling proxy bids on their behalf, setting up auto-bids, systems to identify and contact non-bidders. 		
Age	Older people may be less able to access or engage with online bidding system	<p>An implementation plan will be developed to include the following elements:</p> <ul style="list-style-type: none"> • Supporting users to acquire digital skills, e.g. by engaging with third parties who can provide digital assistance to older people, e.g. Age UK • Helping applicants who cannot easily get online, e.g. by providing mobile phone interface and through libraries and other public services where online services and support and assistance can be accessed • Providing face to face and telephone support for individuals unable to engage with the online bidding system, e.g. personal assistance at 		

		<p>Access Croydon</p> <ul style="list-style-type: none"> • Training support staff, including social workers, day centre and care staff to provide one to one assistance and support. • Setting up systems that prevent people from being disadvantaged, e.g. by enabling proxy bids on their behalf, setting up auto-bids, systems to identify and contact non-bidders. 		

3.2 How will you ensure that the above actions are integrated into relevant annual department or team service plans and the improvements are monitored?

By building this into the overall implementation plan for choice based lettings, including the procurement of a new choice-based lettings system provider.

3.3 How will you share information on the findings of the equality analysis with customers, staff and other stakeholders?

It will be reported to Cabinet in October 2016, along with the recommendations of the report.

Section 4 Decision on the proposed change

4.1 Based on the information in sections 1-3 of the equality analysis, what decision are you going to take?

Decision	Definition	Yes / No
We will not make any major amendments to the proposed change	Our assessment shows that there is no potential for discrimination, harassment or victimisation and that our proposed change already includes all appropriate actions to advance equality and foster good relations	Yes

because it already includes all appropriate actions.	between groups.	
We will adjust the proposed change.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. We are going to take action to make sure these opportunities are realised.	No
We will continue with the proposed change as planned because it will be within the law.	We have identified opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the proposed change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned.	No
We will stop the proposed change.	The proposed change would have adverse effects on one or more protected groups that are not justified and cannot be lessened. It would lead to unlawful discrimination and must not go ahead.	No

4.2	Does this equality analysis have to be considered at a scheduled meeting? If so, please give the name and date of the meeting.
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Cabinet meeting 10 October 2016.

4.3	When and where will this equality analysis be published? An equality analysis should be published alongside the policy or decision it is part of. As well as this, the equality assessment could be made available externally at various points of delivering the change. This will often mean publishing your equality analysis before the change is finalised, thereby enabling people to engage with you on your findings.
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It will be appended to the Cabinet Report.

4.4	When will you update this equality analysis? Please state at what stage of your proposed change you will do this and when you expect this update to take place. If you are not planning to update this analysis, say why not
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The equality analysis will be updated prior to implementing the choice based lettings

scheme to confirm the measures put in place to address the impacts highlighted.

4.5 Please seek formal sign of the decision from Director for this equality analysis?

This confirms that the information in sections 1-4 of the equality analysis is accurate, Comprehensive and up-o-date.

Officers that must approve this decision	Name and position	Date
Head of Service / Lead on equality analysis	Leonard Asamoah	9.9.16
Director	Mark Meehan	9.9.16

Email this completed form to equalityandinclusion@croydon.gov.uk, together with an email trail showing that the director is satisfied with it.

