

NOTICE OF MEETING

Cabinet Member Signing: Taken Under Special Urgency

Tuesday, 7th April, 2020, 11.00 am - URGENT

Members: Councillors Emine Ibrahim – Cabinet Member for Housing and Estate Renewal

- 1. APOLOGIES FOR ABSENCE**
- 2. DECLARATIONS OF INTEREST**
- 3. THE TEMPORARY SUSPENSION OF CHOICE BASED LETTINGS (PAGES 1 - 20)**

Please be advised that the Chair of Overview and Scrutiny has further agreed that the call-in procedure shall not apply to this urgent decision. This is because the decision is urgent and any delay in implementation caused by the call-in procedure would seriously prejudice the Council's or the public's interests given the public health situation and need to re- house residents.

Accordingly, the Chair of Overview and Scrutiny Committee has agreed that the decision is both reasonable in all circumstances, and that it should be treated as a matter of urgency. This is in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution.

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Friday, 03 April 2020

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Report for: Individual Cabinet Member Decision – Cabinet Member for Housing and Estate Renewal

Title: Temporary suspension of Choice Based Lettings

Lead Officer: Director of Housing, Regeneration and Planning

**Report for Key/
Non-Key Decision:** Key Decision

1. Describe the issue under consideration

- 1.1. Section 1.1 of the Council's Housing Allocation Policy, 'Statement of Choice', sets out a commitment to giving applicants a choice over their new home, which is provided for by the Choice Based Lettings system (CBL).
- 1.2. The Choice Based Lettings (CBL) system allows applicants to bid for advertised properties with the highest bidders invited to view the property. However, in the light of Government advice in respect of Covid-19, the Council has an overriding duty to minimise contact with residents. The Council also has significantly fewer staff to administer this system due to self-isolation and increased illness and the same factors require staff to work flexibly to deliver the Council's wider services. It is therefore proposed to temporarily suspend the CBL system for all allocations and replace this with direct lets to specific households until it is safe and practical to resume.

2. Recommendations

- 2.1. It is recommended that the Lead Member for Housing and Estate Renewal:
 - i. Notes the contents of the Equalities Impact Assessment attached at Appendix B.
 - ii. Suspends the Choice Based Lettings scheme for lettings of Council housing on secure or introductory terms for a temporary period.
 - iii. Delegates authority to the Director of Housing, Regeneration and Planning in consultation with the Lead Member for Housing and Estate Renewal to lift the suspension of the Choice Based Lettings scheme when in their view the Government advice on social distancing permits multiple viewings to take place, following which date the Policy will be applied with the temporary changes set out in this report removed
 - iv. Agrees that during the period of suspension all allocations of lettings of Council housing on secure or introductory term tenancies be by direct let as set out in the Housing Allocations Policy as varied as set out in paragraphs 6.3-6.4 below and paragraphs set out in Appendix A.

3. Reasons for decision

- 3.1. Recommendation 3.1 (ii) and (iii) are intended to protect the safety of applicants and staff while minimising the disruption to applicants, allow allocations of accommodation to continue in the current circumstances and release staff to address other Covid-19 work.
- 3.2. These proposals will also minimise the cost to the Council of delaying these moves due to potential rent loss when properties are vacant, as well as the cost of continuing to provide alternative accommodation.

4. **Alternative options considered**

To continue with Choice Based Lettings for all Council lets

- 4.1. This option was rejected because this represents a significant risk to both applicants and staff if continued in the same format. CBL is also a complex and time heavy process and ceasing to do this will relieve pressure on staff managing allocations and release staff to manage the Covid-19 crisis.

To suspend CBL for Housing Association (“PRP”) lets as well

- 4.2. This option was rejected at this time because of the requirement to consult with Private Registered Providers over changes to the Housing Allocations Policy and to give them sufficient time to respond. While a minimal period of consultation would be reasonable, where this has no effect on their nominations, a longer period would be required to suspend the use of CBL for nominations to PRPs.

To suspend all new lets

- 4.3. This option was rejected because this would prevent households from moving from accommodation that is unsuitable for their needs for example where households have specific medical requirements or are fleeing violence.

5. **Background information**

Temporary suspension of CBL for all Council tenancies

- 5.1. Most available social housing lets are advertised through Haringey’s CBL system, Home Connections, to allow households to bid for properties they are interested in. Group viewings are then organised with the property let to the highest priority person who views and wants it. Priority is determined by the applicants Housing Band and then by their Applicable Date which is usually their application date.
- 5.2. In the light of Government advice to minimise personal contact and maintain social distancing, it is proposed that CBL bidding is suspended for the following reasons: -
 - The CBL bidding process involves a significant degree of personal contact and social distancing will be difficult to enforce particularly at viewings; even were viewings to be staggered so that only one applicant was viewing at any one time. The Council does not have access to Personal Protection Equipment for the viewings staff, or applicants.
 - The selection process through CBL is in any event staff intensive, and staff absences due to Covid-19 infection or self-isolation could lead to delays and reduce the Housing Demand resources available to respond to Covid-19.

- Some households however do need to move urgently. This includes urgent transfer cases, care leaver moves etc. Allocation should continue for these cases and use of direct lets will reduce the necessity for personal contact.
 - Not advertising the properties will give flexibility to use some of the lets on a temporary basis. This would enable the Council to meet priority homelessness need if there were difficulties in sourcing temporary accommodation.
- 5.3. During the temporary suspension of CBL for Covid-19 shutdown, it is proposed that for Council lettings, the first bullet point of 1.1.2 of the Allocations Policy will be suspended and temporarily replaced by the following: -

“Applicants will have the ability to state their preferences for properties before the formal viewing, and, where these are reasonable and the policy allows, properties can be refused both before and immediately after the viewing. However, some applicants will only be eligible to receive one offer and, if refused without good reason, will face the same sanctions as set out in the policy. This includes households in temporary accommodation”.

- 5.4. It is also proposed that for Council Lettings, the commitments set out in 1.4 of the Housing Allocations Policy that offers a choice of accommodation is suspended, together with the expectation that most lets will be allocated through the CBL system. Specific sections to be suspended for Council lets are provided in Appendix A.

Replacement by direct lets for all Council tenancies

- 5.5. Making direct let offers to urgent cases should mean that only one person/household would attend a viewing at any one time. Only if the offer was refused would another viewing be required. This would minimise the risk to both staff and households who would normally attend multiple viewings.
- 5.6. It is therefore proposed that for the duration of the suspension of CBL, (in addition to the provisions for direct let set out in section 6.9 of the Housing Allocations Policy), all Council properties, will be allocated by direct let. This will allow the Council to meet the lockdown requirements and social distancing that is being enforced by the Government and specifically the requirements set out in the “Stay at home and away from others (social distancing)” provisions of the Coronavirus Act 2020.

The approach to allocations following approval of the suspension of CBL suspension and commencement of direct lets for all allocations

- 5.7. On suspension of CBL, a message would be provided both on the Home Connections site and on the Council and Homes for Haringey websites advising applicants that bidding on Council-owned properties is suspended due to the current circumstances and that we will seek to target those properties to meet the most urgent need.
- 5.8. There are currently 15 general needs voids that have not yet been advertised and these, together with any future voids would no longer be allocated through the CBL system
- 5.9. Applicants will be selected for offers on the basis of their assessed requirements. In particular, with an expected reduction in available voids, premises that are available will be prioritised for those with an urgent need to move. Selection for offers of those within that description will be in accordance with an applicant’s priority and reasonable preference as provided for within the Policy, taking into account any preferences they express.

- 5.10. There are also two sheltered housing voids. Unless there is an urgent need for permanent moves into sheltered accommodation, it is proposed to retain these two sheltered housing voids and any subsequent sheltered housing voids as temporary accommodation. This will enable support to be provided to any urgent hospital discharge cases for those over the age of 55 or to support step down arrangements for those transferring from Adult Social Care provision.

Housing Association (Private Registered Provider) lets

- 5.11. The Council is required to notify Private Registered Providers (Housing Associations) with whom it has a nomination agreement of any proposed changes to the Housing Allocations Policy and give them reasonable time to comment. Given the urgency of this proposal, the suspension of Housing Associations CBLs will be considered at a later date.
- 5.12. This delay in considering this is unlikely to have a significant impact because some Housing Associations have already advised that they will be delaying relets due to the current difficulties in undertaking viewings and void works. This means a reduced number of nominations are expected. The reduced number of nominations available will mean less drain on the Council allocation team's resources and so manageable within existing resources. Only one household will be given the opportunity to view each Housing Association letting.
- 5.13. Housing Association tenancies are traditionally less popular than Council tenancies and more likely to be refused if offered directly. It is therefore potentially more controversial to suspend Choice Based Lettings for any Housing Association nominations that do arise, with only one household viewing at any one time.

Housing Association (Private Registered provider) comments

- 5.14. Where the Council has nomination rights, the Council will inform Housing Associations with stock in the borough of the proposed change and invite them to submit their comments. Given the urgency of need to implement this proposal, any comments received will be reviewed and the Lead Member for Housing and Estate Renewal informed prior to the decision being made.

6. Contribution to strategic outcomes

- 7.1 This project will help to achieve the Borough Plan Outcome 3 under the Borough Plan's Housing priority, for which the vision is for a safe, stable and affordable home for everyone, whatever their circumstances.

7. Statutory Comments

Legal Comments

- 7.1. The Assistant Director for Corporate Governance has been consulted in the drafting of this report and where not set out below legal comments have been incorporated into the main body of this report.
- 7.2. The Housing Allocation Policy sets out how the Council selects those to whom it will (other than by way of transfer) grant an introductory or secure tenancy of its own housing accommodation, or whom it will nominate to be a secure, introductory or assured tenant of accommodation held by other persons including Housing Associations.
- 7.3. Part 6 of the Housing Act 1996 and regulations made thereunder require the Council to have such an Allocation Policy, and to allocate according to it. The legislation also

provides for how the Policy should be framed including eligibility and qualification for allocation, as well as for categories of persons who must be given reasonable preference and may or must be given additional preference.

- 7.4. The Council must in its Policy state its policy on offering applicant's choice of housing accommodation or the opportunity to express preference about allocation.
- 7.5. No public consultation is statutorily required on this decision. The Council has hitherto followed a practice of public consultation on significant changes to the Policy. The urgency of the situation and the practical constraints on consultation imposed by legislation and guidance intended to reduce the spread of Covid 19 justify departure from that practice for the temporary changes outlined in this report.
- 7.6. Before making a major alteration to its Scheme, the Council is required (s166A(13)) to send a copy of the proposed alteration to every private registered provider and registered social landlord (housing association) with whom they have nomination arrangements and give them a reasonable opportunity to comment on the proposals.
- 7.7. The Council is entitled, in deciding what is a reasonable opportunity to comment on the proposed change, to take account both of the urgency of the decision and the fact that the decision here proposed does not directly affect nominations to private registered providers. The decision-maker must however take account of any comments in fact received before making the decision.
- 7.8. It would be open to the Council, if appropriate in the light of comments received from private registered providers, to make a further decision as to the arrangements for selecting nominees to private registered provider lettings.
- 7.9. The Assistant Director Corporate Governance sees no legal reason preventing the Director from approving the recommendations in the report.

Finance

- 7.10. The temporary suspension of choice based letting will mean that rehousing of tenants will be by direct offer and facilitate the quick rehousing of tenants.
- 7.11. This on its own does not appear to have additional financial implication.

Equalities

- 7.12. The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:
 - Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
 - Advance equality of opportunity between people who share those protected characteristics and people who do not
 - Foster good relations between people who share those characteristics and people who do not.
- 7.13. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 7.14. At present a Choice Based Lettings (CBL) scheme operates to allocate housing to those on the housing register in Haringey. The proposed change would see the CBL scheme

suspended and replaced with a direct lettings system temporarily, during the Covid-19 period.

- 7.15. There are two main reasons for this proposed change; firstly, under the CBL scheme multiple families are invited to view properties at once. This approach is in opposition to current NHS and government guidance to social distance and stay home where possible¹ as mandated by the Coronavirus Act 2020.² Secondly, the Covid-19 outbreak is reducing the number of available properties, and therefore the choice available to those on the housing register. The proposed change will enable those most in need to access safe and secure accommodation during this period, while minimising the risk of them contracting Covid-19.
- 7.16. Temporarily suspending the CBL scheme, will impact households on the housing register who would have otherwise been rehoused with a choice of housing. These households represent bands A and B (waiting the longest) on the housing register.
- 7.17. Available data shows that the proposed change is likely to have a disproportionate impact on people from a BAME background and females. This is because individuals with these protected characteristics are overrepresented in bands A and B of the housing register. However, if this proposed change is not adopted, those on the housing register most in need will be unable to access a safe and secure home during this time.
- 7.18. Households would usually have a choice of options during a rehousing period, and we recognise that the proposed change will disproportionately impact on some groups. The Equality and Human Rights Commission (EHRC) advise that to respond effectively to the Covid-19 crisis there is a need for flexibility and compromise to both protect rights and save lives.³
- 7.19. It is important to note that this decision allows the CBL scheme to continue to operate when households are offered a housing association tenancy as opposed to a council housing tenancy. The continuation of CBL for housing association lets will be reviewed in a separate decision but where this continues, this will enable a continued choice of tenancy type and in accordance with NHS and government guidance only one household will be invited to view a property at any one time (see paragraph 5.11-5.13).
- 7.20. Once safe to do so, the CBL scheme will be reinstated and check-ins with households that were given direct housing options during the Covid-19 period will continue, to ensure the needs of tenants are met. An EQIA has been completed which sets out the impacts of the proposed change on those on the housing register, and ways these will be mitigated. This will help to inform the direct letting approach.

8. Use of Appendices

Appendix A: Text replacement text for 2.1 and text to be suspended

Appendix B: Equalities Impact Assessment

9. Local Government (Access to Information) Act 1985

Housing Allocations Policy 2015 revised 2018

¹ Stay at home and away from others (social distancing). Gov.UK. 2020.

<https://www.gov.uk/government/publications/full-guidance-on-staying-at-home-and-away-from-others>

² Coronavirus Act 2020. UK Parliament. 2020 <https://services.parliament.uk/bills/2019-21/coronavirus.html?fbclid=IwAR2d7oIwE3-I2ZVClwgwzHGikQdD9Avs9E-ZL2IZe7R3LOyuvvWAAI4GcU>

³ Human rights and the equality considerations in responding to the coronavirus pandemic. EHRC. 2020 <https://www.equalityhumanrights.com/en/our-work/news/human-rights-and-equality-considerations-responding-coronavirus-pandemic>

https://www.haringey.gov.uk/sites/haringeygovuk/files/haringeys_housing_allocations_policy_2015_amended_14_march_2018.pdf

Signed Agreement of the Leader/ Cabinet Member to the recommendations.

Signature.....

Name

Date.....

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Appendix A: Text replacement text for 2.1 and text to be suspended

This appendix sets out the replacement text for Housing Applications Statement of Choice, replacing the first two bullet points of 1.2.2, and the paragraphs to be suspended.

Replacement text for 1.1.2

The first two bullet points of 1.1.2 and replaced by

“Applicants will have the ability to state their preferences for properties before the formal viewing, and, where these are reasonable and the policy allows, properties can be refused both before and immediately after the viewing. However, some applicants will only be eligible to receive one offer and, if refused without good reason, will face the same sanctions as set out in the policy. This includes households in temporary accommodation

Paragraphs to be suspended for Council Housing lets only

1.2.5

1.3.3

The first objective of 1.4

1.5.1 & 1.5.3

1.5.5 – 15.9

6.1.1 to 6.1.5

6.2.1 to 6.2.4

6.3.1 to 6.3.6

6.4.1 to 6.4.3

6.5.1 to 6.5.7

6.6.1 to 6.6.5

6.7.1 to 6.7.7

6.12.1 to 6.12.7

6.13.5 to 6.13.7

6.17.1 to 6.17.4

6.18.1

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EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty**' on all public bodies to have '**due regard**' to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one.
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition, the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protected characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision-making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment

Name of proposal	Temporary suspension of Choice Based Lettings
Service area	Housing, Regeneration and Planning
Officer completing assessment	Martin Gulliver
Equalities/ HR Advisor	Emma Carroll/ Hugh Smith
Meeting date	7 April 2020
Director/Assistant Director	Alan Benson, Assistant Director of Housing

2. Summary of the proposal

Due to the impact of the Covid-19 virus, government guidance to minimise social contact, and the virus’ impact on staffing levels, it is proposed to temporarily suspend Choice Based Lettings as a means of allocating Council tenancies and replace this by direct offers.

Choice Based Lettings allows applicants to choose their own home and empowers those applicants willing and able to exercise this choice. However, the Choice Based Lettings system arguably disadvantages some on the basis that while it seeks to provide more choice and control over key life decisions for the many, for the more vulnerable, less proactive and less able to compromise, it can have negative consequences . These disadvantaged households would be over-represented among protected groups and so these groups may benefit from its temporary replacement by direct lets.

This decision will affect applicants on the housing register who

- Are allocated these properties without a choice to bid for them
- Would have been successful in bidding for these properties

Given the urgency to implement the temporary suspension of Choice Based Lettings, this decision will be taken by a Cabinet Member signing.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Protected group	Service users	Staff
Sex	Data from the housing register	<i>This policy only impacts on staff insofar as they are applicants on the housing register and when they have been offered, or would have been offered, a property during this temporary suspension.</i>
Gender Reassignment	Equalities and Human Rights Commission	
Age	Data from the housing register	
Disability	Data from the housing register	
Race & Ethnicity	Data from the housing register	
Sexual Orientation	ONS Population estimates	
Religion or Belief (or No Belief)	Data from the housing register	
Pregnancy & Maternity	Data from the housing register	
Marriage and Civil Partnership	Data from the housing register	

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough’s demographic profile? Have any inequalities been identified?

The data used within this EqlA was obtained from the Council’s housing register database on 7th January 2020. The Housing Register is updated on a regular basis.

Sex

Sex	Band A	Band B
Female	62%	76%
Male	38%	24%
Total	100%	100%

This data shows that female headed households are over-represented among both Band A and Band B households.

Gender reassignment

There is limited Council or census data relating to this protected characteristic. It is estimated that there are between 200,000 to 500,000 in the UK who identify as being transgender.

Age

Age group	Band A	Band B
15-19	3%	0%
20-24	11%	3%
25-29	5%	10%
30-34	4%	16%
35-39	6%	18%
40-44	5%	18%
45-49	9%	15%
50-54	12%	10%
55-59	16%	6%
60-64	9%	2%
65-69	7%	1%
70-74	5%	0%
75-79	3%	0%
80-84	3%	0%
85-89	1%	0%
90 and over	0%	0%
Total	100%	100%

The data shows that older people are over-represented in Band A and younger households in Band B, relative to all households on the housing register.

Among Band A households, there are a considerable number of who are

- Either existing tenants who have band A status while awaiting a move from an estate renewal scheme, or who are under-occupiers. Both these groups have a higher proportion of older households relative to the housing register as a whole.
- Care leavers – who are relatively young and represent most of those in the under 24 years of age in Band A

In contrast, Band B is mostly comprised of households in temporary accommodation, among whom a significant proportion are younger families.

Disability

Disability	Band A	Band B
Disabled	33%	12%
No disability	67%	88%

Total	100%	100%
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This data shows that there is a high percentage of households with disability in Band A. Band A is largely made up of households who are either existing tenants who have Band A status while awaiting a move from an estate renewal scheme, or who are under-occupiers. Both these groups have a higher proportion of older households who in turn are more likely to have disabilities. The data also shows a relatively low percentage in Band B.

Race and ethnicity

Ethnic origin	Band A	Band B
Any Other Ethnic Group	8%	8%
Bangladeshi/UK Bangladeshi	1%	3%
Black African	13%	27%
Black British	10%	7%
Black Caribbean	15%	11%
Black Caribbean and White	2%	1%
British Asian	0%	1%
Chinese	1%	1%
East African Asian	0%	1%
Indian or UK Indian	1%	1%
Irish Traveller	0%	0%
Mixed Asian and White	1%	0%
Mixed Black	1%	0%
Mixed Black African/White	1%	1%
Mixed Other	1%	2%
No Response	2%	1%
Other Asian	1%	2%
Other Black	1%	1%
Other Ethnic Group Arab	0%	0%
Other White	2%	4%
Other White European	3%	9%
Pakistani / UK Pakistani	0%	1%
Refused	6%	2%
Traveller	0%	0%
Unknown (data take on)	4%	2%
White British	19%	7%
White Greek Cypriot	1%	0%
White Irish	3%	1%
White Kurdish	2%	2%
White Turkish	3%	4%
White Turkish Cypriot	1%	2%
Total	100%	100%

This data shows an over-representation among both Band A and Band B of Black households. Band B shows an over-representation of Black African households in particular. Band B households are less likely to be White British than Band A households.

Sexual orientation

Sexuality	Band A	Band B
Gay Woman/Lesbian	0%	0%
Heterosexual	4%	5%
Other	0%	0%
Unknown/prefer not to say	96%	95%
Total	100%	100%

3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. This information is held for 4-5% of households the housing register. It is therefore not possible to determine the proportion of people on the Housing Register who identify as LGB+

Religion or belief (or no belief)

Religion/faith	Band A	Band B
Buddhist	1%	0%
Christian	11%	2%
Hindu	0.4%	0%
Jehovah Witness	0.2%	0%
Muslim	5%	2%
No Religion	3%	0%
Unknown/prefer not to say	80%	95%
Total	100%	100%

The available Housing Register data indicates a very low reporting rate for religion / belief, and so it is not possible to accurately determine the proportions of people on the housing register who are members of religious or faith groups or who have no religion.

Pregnancy/maternity

Pregnancy/maternity	Band A	Band B
No	100%	98%
Yes	0%	2%
Total	100%	100%

The data indicates that a small number of households in Band B contain either pregnant women or children under the age of six months.

Marriage and civil partnership

Marital status	Band A	Band B
Civil Partner	0%	1%
Co-habiting	0%	0%
Divorced	5%	4%
Living with partner	1%	1%
Married	13%	33%

Separated	0%	1%	
Single	71%	56%	
Unknown	8%	4%	
Widowed	1%	0%	
Total	100%	100%	

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

The urgency of this proposal means that there has been little time to consult prior to the decision. Applicants who are seeking rehousing through the Choice Based Lettings system will receive a message on the Home Connections site and via the Council and Homes for Haringey websites advising them explaining that the system has been suspended.

Housing Associations have been asked for comments on this proposal. However, because it does not affect nomination to their own stock there will be no impact on their own lets.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Consultation with applicants has not been undertaken prior to the decision due to the urgency and temporary nature of the proposal. Housing Associations have also been advised of this proposal but with a very short deadline as required by this urgent decision. No response has been received at the time of this document. Any responses that are received before the decision will be considered when the decision is made.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

1. Sex

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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The data analysis indicates that a higher number of women than men will be affected by the decision. Women are therefore more likely to be among those benefiting from the decision, as they will be directly let accommodation, and also more likely to be among those who may be negatively affected by the decision because accommodation they would have otherwise bid for will have been directly let. However, the effect is likely to be small due to the temporary nature of the proposal.

2. Gender reassignment

Positive		Negative		Neutral impact	X	Unknown Impact	
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Transgender people are more likely to experience homelessness and face high levels of hate crime as well as discrimination in relation to issues such as securing housing and lower levels of pay. The Council does not envisage this temporary suspension will have a disproportionate impact on this protected characteristic.

3. Age

Positive		Negative		Neutral impact	X	Unknown Impact	
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The data analysis indicates that there are significant proportions of both older and younger people on the housing register, and that there are more older people in Band A and more younger people in Band B. However, the high proportion of older Band A applicants are either under-occupiers or on an estate renewal scheme and these households may not be prioritised during this period where there is no urgent need to move. However, vulnerable households within this group are likely to benefit from this proposal. The effect is likely to be small due to the temporary nature of the proposal.

4. Disability

Positive	X	Negative		Neutral impact		Unknown Impact	
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The data analysis indicates that people with disabilities will be overrepresented among those affected by the proposal. This is because a higher proportion of Band A households have members with disabilities, and because Band A households are more likely to be directly let accommodation, people with disabilities can be expected to benefit from the decision. Vulnerable households within this group are particularly likely to benefit from this proposal. However, the effect is likely to be small due to the temporary nature of the proposal.

This temporary proposal may increase the number of lets to clients needed specialist types of property as these will be targeted on those who need it.

5. Race and ethnicity

Positive	X	Negative	X	Neutral impact		Unknown Impact	
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BAME households are overrepresented on the housing register relative to the population of Haringey. Black households are notably overrepresented among Band A households. These households are among those who are most likely to benefit from direct lets. However, it is also notable that BAME households will be among those who will not be able to bid for accommodation that will have been directly let. Vulnerable households within this group are particularly likely to benefit from this proposal. The effect is likely to be small due to the temporary nature of the proposal.

6. Sexual orientation

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council does not envisage that this proposal to temporarily suspend Choice Based Lettings will have a disproportionate impact on this protected characteristic.

7. Religion or belief (or no belief)

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council does not envisage that this proposal to temporarily suspend Choice Based Lettings will have a disproportionately affect any religious or faith group.

8. Pregnancy and maternity

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council does not envisage that this proposal will have a disproportionate impact on this protected characteristic

9. Marriage and Civil Partnership

Positive		Negative		Neutral impact	X	Unknown Impact	
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The Council does not envisage this proposal will have a differential impact on either married people or people in civil partnerships.

10. Groups that cross two or more equality strands e.g. young black women

Black women are over-represented in Band B. Within this group, those with the longest waiting times. may be affected by the temporary loss of choice over properties to bid for especially if their current accommodation is suitable and have no urgent need to move. Vulnerable households within this group are particularly likely to benefit from this proposal. Any impact will be minimal due to the temporary nature of this proposal and those affected will have the highest priority for properties when Choice Based Lettings can resume.

Outline the overall impact of the policy for the Public Sector Equality Duty:

The proposal to temporarily suspend Choice Based Lettings will have a small impact on affected households, and households with the highest priority who would have selected homes and been successful will have the highest priority for properties after CBL resumes. The decision represents a measure to protect the health and wellbeing of all people in Council accommodation and on the housing register in the context of the Covid-19 pandemic.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.</u>	Y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
<i>Lost ability to bid for accommodation, impacting women, younger people, people with disabilities, and pregnant women</i>	<i>Resume choice-based lettings once social distancing measures are no longer required</i>	<i>Director of Housing, Regeneration and Planning</i>	<i>2020</i>

Please outline any areas you have identified where negative impacts will happen as a result of the proposal, but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

Although there may be a reduction in lets to those on estate renewal schemes and under-occupiers who generally are older, these households will continue to have the highest priority once Choice Based Lettings resumes.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

This is a temporary proposal which is designed to make sure that the few properties that become available will be allocated to those in the most urgent need. Monitoring will be undertaken as part of the usual analysis undertaken during the Annual Lettings Plan.

7. Authorisation

EqIA approved by ..  (Alan Benson, Assistant Director)	Date 3 April 2020
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8. Publication

Please ensure the completed EqIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqIA process.