Equality Analysis (EA)

Section 1 – General Information (Aims and Objectives)

Tower Hamlets Common Housing Register Partnership Allocation Scheme Review 2019/20



Proposal to exclude existing social housing tenants (under the age of 50) from Band 3 of the Common Housing Register

Following a review of the Council's Housing Allocations Scheme and a subsequent public consultation exercise, the Council have listened to the views and concerns expressed by residents and have amended one of the key proposals which it had originally put forward to residents.

The current review of the Allocations Scheme has been carried out in accordance with the Localism Act (2011). The Allocation Scheme provides details of how the Council allocates its stock of social housing. The Localism Act gave local authorities new powers to shape the way in which they approach allocations, manage their waiting lists and make use of tenancies.

Although local authorities are still required to operate and publish an Allocations Scheme, the scheme itself no longer needs to be open to all applicants. The Act still requires local authorities to grant priority to households meeting the existing reasonable preference criteria; but in addition to this, they have been given greater flexibilities and discretion to shape their approach to allocations. The Council also chooses to give additional assistance to other groups based on local priorities

The Allocation Scheme was last reviewed in 2016 and the primary drivers for this current review have been:

- Recent legislation. The Homelessness Reduction Act (2017), which was enacted in 2018, placed a legal duty on the Local Authorities to ensure reasonable preference is given to applicants either threatened with homelessness or homeless before a full housing duty is owed.
- 2. To take into consideration the various Codes of Guidance on Allocations Schemes as issued by the Government. ¹
- 3. To ensure the Allocation Scheme meets the current needs of our residents and key aspirations and objectives of the Council.
- 4. To enable the council to **make the best use of social housing stock** within the borough.
- 5. To better manage the expectations of residents

The original proposal which the Council put forward suggested that applicants in Band 3 of the Common Housing Register be limited. Band 3 of the Common Housing Register is a non-priority housing options band where applicants have been assessed as being adequately housed without having a defined housing need.

https://www.gov.uk/government/publications/allocation-of-accommodation-guidance-for-local-housing-authorities-in-england published December 2013

https://www.gov.uk/government/publications/right-to-move-statutory-guidance-on-social-housing-allocations-for-local-housing-authorities-in-england published March 2015

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/753667/Improving_access_to_social_housing_for_victims_of_domestic_abuse.pdf_published November 2018

¹https://www.gov.uk/government/publications/allocation-of-accommodation-guidance-for-local-housing-authorities-in-england published June 2012

The original amendment proposed that entry to Band 3 would have been limited to the following applicants:

- Singles or couples over 50 years as these applicants have a realistic chance of being housed in low demand homes designated for older people, including sheltered accommodation.
- Any applicant requiring sheltered accommodation because this type of accommodation is in low demand in the Borough.
- Any out of borough housing applicants placed there as a part of the homelessness prevention offer (if that proposed policy amendment is agreed and implemented)

This would have meant that existing social housing tenants (those who have a council tenancy or a tenancy with a housing association), those applicants who live with family and friends and those renting a property from the private rented sector would have been excluded/removed from the Common Housing Register.

The Council has listened to the views of residents - 69% of those who responded to our online questionnaire (see the Consultation Report) either strongly disagreed or disagreed with this proposal. It was apparent that respondents felt that this was not fair to those in Band 3 who reside with parents/family or friends or those privately renting a home.

After considering all the feedback from the consultation exercise, the Council now proposes to only exclude existing social housing tenants (under the age of 50) from Band 3 of the Common Housing Register.

Demand information captured from the CHR on 1st April 2020 shows that there were **8,440** applicants placed in Band 3. The revised proposal to exclude existing social housing tenants under the age of 50 from Band 3 will effectively remove **1,453** applicants from the CHR using this data.

It is important to note that there are a significant number of Band 3 applicants **who have never placed a bid for a property,** without bidding, an applicant in Band 3 can never hope to move on from their existing property.

Of the 1,453 existing social housing applicants under the age of 50 on the CHR, **331 applicants have never placed a bid on a property.** This equates to 23% of all existing social housing tenants under the age of 50 on Band 3 (This Information was extracted from the CHR on 18th May 2020). This means that of those existing social housing tenants in Band 3 under the age of 50, only 1,122 applicants have actively bid for a property at any time since they joined the CHR.

The table below captures data on the tenures currently occupied by applicants in Band 3 with effect from 18th May 2020.

2,760 (33%)
3,094 (37%)
2,034 (24%)
563 (6%)

Of the 33% of existing social housing tenants presently on Band 3 of the CHR, **17.2%** are under the age of 50. The reason behind the Council's decision to retain existing social housing tenants over the age of 50 has been drawn from lettings information collated over the course of the last 4 years which illustrates that while allocations of properties to applicants within Band 3 rarely happen, the majority of lets that are made, have been to applicants aged 50+.

Lettings to Band 3 applicants make up a small percentage of the overall churn in the Borough's social housing stock. Data from the last financial year, (April 2019 to March 2020), reveals that during this

period from a total of 1,862 social housing lets were made from which 93 properties (5% of all social housing lets) have been let to Band 3 applicants.

Similarly, data from the financial year 2018/19 demonstrated that a total of 1,329 social housing homes were let to Band 3 applicants; only 5.9% of these lets (79 units) went to applicants in Band 3. From these units, 50 were designated as accommodation for applicants over 50 or as sheltered accommodation. Again in 2017/18, 1,680 social housing homes were let, and a total of 90 units went to Band 3 applicants (5.3%). This not only confirms that the majority of available lets go to applicants in Band 1 and 2 with priority housing need but also from the few lets which become available to applicants in Band 3 applicants, the majority of lets are predominately going to those residents aged 50+.

Further information on the Common Housing Register from the last complete financial year (2019/20), breaks down the ages of those applicants who were granted a social housing tenancy for 91 of the 93 social housing units let to Band 3 applicants.

Age Groups	Number of lets per age group
26 to 40	20
41 to 50	10
51 to 60	25
Over 60	36
Total	91 (out of a total of 93 Lets to all ages in Band 3)

Around 2/3's of all lets in Band 3 go to existing social housing tenants aged 50+.

The demand from Band 3 applicants in terms of the number of bedrooms they require, as of 1st April 2020, is detailed in the table below. This shows that the highest bedroom need among applicants on Band 3 is for a one-bedroom property (68% of all applicants)

Bed need	No of applicants in Band 3
1 Bed	5,708
2 Bed	1,768
3 Bed	885
4+ Beds	90
Total	8,451

The reality is that the existing social housing applicants under the age of 50 who are removed from Band 3 under this proposal, remain unlikely to ever secure an offer of a further social housing tenancy. These applicants are adequately housed and have some degree of settled accommodation. As evidenced, 23% of existing social housing tenants have not bid for any properties since joining Band 3 of the CHR.

The reasoning behind this level of bidding inactivity among this cohort within Band 3 is difficult to quantify. It may be that applicants do not understand that they must actively bid on the limited properties which become available or may join the Common Housing Register in the hope that the longer they remain on the list, the more likely that they will be contacted or ranked higher in the bidding process.

As demand for social housing increases, all local authorities need to be prudent in ensuring that that those in the greatest need continue to receive priority on the CHR. From a service point of view, our priority is to help those in the genuine housing need, and not those who are already adequately housed and not in priority need – their housing need has been met by the Council. With the constraints on the Council's resources, existing social housing tenants under the age of 50 who wish to transfer to another social housing property should be encouraged to actively seek alternative accommodation using existing mutual exchange/swap schemes.

This proposed realignment of the CHR will more accurately reflect housing need in the Borough. From the few lets which occur within this Band at present, the majority go to those residents aged 50+ who may wish to downsize or seek sheltered accommodation. Retaining the access to Band 3 of the CHR to existing social housing tenants aged 50+ ensures movement within the housing stock, allowing officers to make the best use of the limited supply available by freeing up larger sized homes which are much needed by other residents in the Borough.

The Localism Act 2011 amended section 159 of the Housing Act 1996 so that transfer applications from existing tenants in social housing no longer have to be assessed on the same basis as applications from households applying on the Common Housing Register, unless the authority is satisfied that the household applying for a transfer should be given reasonable preference in accordance with section 166A (3)². In which case, these existing social housing tenants would be prioritised in either Band 1 or 2 of the Common Housing Register, depending on their circumstance.

The statutory guidance does not cover how authorities should set up and administer applications for transfers from households that do not fall into a reasonable preference category.

For those existing social housing tenants under the age of 50 which this proposal is seeking to exclude from Band 3, there are several alternative housing options available to them (see list at Appendix C of this document) and in the further promotion of these options, it will help to manage residents' expectations.

The Council also needs to utilise the supply of Intermediate Housing³ available within the Borough. Officers are currently seeking approval from Cabinet to develop an Intermediate Housing Register. Intermediate Housing provides a potential mechanism to release more affordable homes to our Borough's residents and an opportunity to alleviate the increasing pressures on the Borough's finite supply of social housing. Officers therefore are seeking permission from the Cabinet to develop an Intermediate Housing Register and supporting policy as an additional route for residents who are seeking affordable housing.

Over the course of the next few years, the Council intends to develop more Intermediate Housing homes within the Borough. Since 2013/14 to the end of 2019/20 a total of 1,665 intermediate homes were completed. It is anticipated that pipeline projects in the Borough between now and the end of 2022/23 will yield a further 1,453 new intermediate homes.

As a result of these proposed amendments, applicants will have additional housing options and be rehoused more quickly. These proposed changes will assist the Council in making the best use of the limited supply of housing available within the Borough to meet the housing needs of its residents.

Under the Equality Act 2010, the Council must have due regard to the need to:

Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by

a) people who are homeless (within the meaning of Part 7);

² This section of the Act states that each local housing authority must have an Allocations Scheme which sets out its priorities, the scheme must be framed to ensure that reasonable preference is given to:

b) people who are owed a duty by any local housing authority under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3);

c) people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions:

d) people who need to move on medical or welfare grounds (including any grounds relating to a disability); and

e) people who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or to others).

³ Intermediate housing products are homes for sale and rent provided at a cost above social rent, but below market levels. These can include shared equity (shared ownership and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rented housing

or under the Act;

- Advance equality of opportunity between those with a protected characteristic and those without:
- Promote good relations between those with a protected characteristic and those without.

The 'protected characteristics' referred to are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; gender, sexual orientation. It also covers marriage and civil partnerships. The intention of this equalities assessment is to give consideration of the proposed change to Band 3 of the Common Housing Register under the Council's Allocations Scheme regarding each protected characteristic to ensure that any discrimination or adverse impact is mitigated. In addition, the Council also considers the socio-economic impact on the community.

This equalities impact assessment looks at the impact of the above proposed changes on the protected groups and suggests appropriate mitigation actions where necessary.

Conclusion - To be completed at the end of the Equality Analysis process

Following extensive consultation with residents and key stakeholders the original proposal to remove certain Band 3 applicants from the Common Housing Register was amended to now only exclude social tenants under 50 years of age. They will be encouraged to consider all the alternative housing options available to them to move. Those that do not currently hold a social tenancy under 50 years of age will remain in Band 3.

Based on the EA, as there is only a neutral impact across all the protected characteristics, it is thought that the revised proposal will not have a disproportionate impact on existing social housing tenants under the age of 50. Therefore, it has been agreed to proceed with the amended proposal.

Name: Rafiqul Hoque

(signed off by)

Date signed off: 15 June 2020

(approved)

Service area:

Housing and Regeneration

Team name: Housing Options

Service manager: Rafiqul Hoque

Name and role of the officer completing the EA: Una Bedford, Strategy and Policy Officer (Place)

Section 2 – Evidence (Consideration of Data and Information)

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

The initial proposal to exclude applicants from Band 3 of the CHR would have removed existing social housing tenants under the age of 50, applicants who live with family and friends and those renting a property from the private rented sector.

On review of the comments made by respondents who completed the online questionnaire/consultation survey, it became clear that there is considerable concern that applicants who living with family and friends and renting in the private sector would be excluded from joining the CHR.

Anecdotal evidence from respondents in these groups highlighted common themes - housing

affordability and the frustration that many young adults have that they are unable to move out of their parental home and to remain in their local area where they have existing family ties. There is also concern that they may lose their local connections if they move out of the Borough.

Rents in the private sector are high and are disproportionate to income levels to many private tenants in the Borough, the ability to remain on the CHR for private tenants who are adequately housed and not in priority need is critical for residents and allows them hope that they will one day be able to bid successfully for a social housing property.

While it is clear from the data available on Band 3 lets that applicants within this cohort rarely are made an offer of a social housing tenancy, to remove those applicants who are living with family and friends or renting in the private sector in the Borough would take away any hope.

The Council remains committed to increasing the supply of council homes and its programme of building. Although progress is being made, the level of demand for social housing will never be met as it far outstrips supply. Where possible, the Council aim to utilise other housing options for residents which include various transfer and mutual exchange schemes by encouraging existing social housing tenants under the age of 50 who are adequately housed and without priority need. These possibilities will be promoted and encouraged actively by the Council's Housing Options Team.

Similarly, the proposed creation of an Intermediate Housing Register of interest for an affordable housing schemes in the Borough, may provide a first step towards home ownership for those existing social housing tenants who have the financial mean and wish to move on from social housing. It will also help those who are living with parents or relatives or those who rent privately into affordable rent and again towards staircasing towards their owning their own home, freeing up the housing possibilities for residents in the Borough.

For staff, the proposal to limit Band 3 of the CHR will require minimum training to ensure that those who assess eligibility to join the CHR are aware both of this change and other housing options available to those who will be excluded under this proposal. IT systems and the Council's Home seekers webpage will need to be updated and expanded to allow those seeking housing advice to 'self-serve' and pursue new housing options.

Section 3 – Assessing the Impacts on the 9 Groups

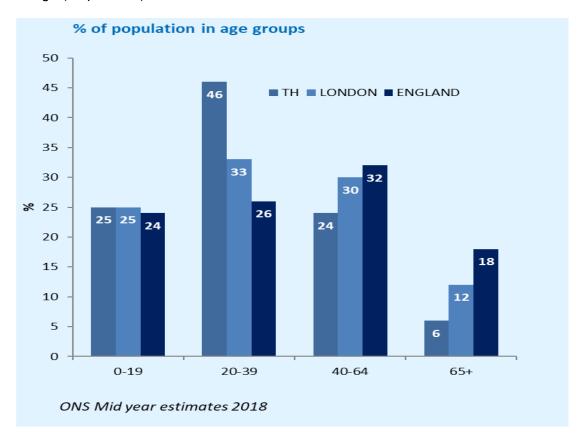
1) Age

Tower Hamlets has a similar proportion of young people aged 0-19 to England and London. One in four (25%) of the Borough's residents are in this age group. The largest age group is the 20-39-year olds. Approximately 46% of the population are aged 20-39. This is higher than London (33%) and England (26%).

England has an older population when compared to Tower Hamlets and London. Only 6% of the Borough's population are aged 65+ compared to 12% in London and 18% in England.

Tower Hamlets has a relatively young population compared with the rest of the country. Our median age in 2017 was 31.0 years which was the 4th youngest median age out of all local authorities in the UK. The median age was 35.1 in London (4.1 years older), 39.8 in England (8.8 years older) and 40.1 in the UK (9.1 years older).

The figure below shows the difference between the age profiles in Tower Hamlets compared to the rest of London and compared to England. aged 20-39, the highest proportion in the UK, and well above the London average (34 per cent).



The Borough's relatively young age profile reflects the fact that over the past ten years, the borough's working age population has increased much more quickly than the child population or older age groups. In addition, nearly eight in ten (77 per cent) residents who have lived in the borough for less than 5 years are aged between 18 and 3414, and 88 per cent of our economic migrants in 2017/18 were aged 18 to 3415.

While the Borough's population is projected to age slightly in the coming years, it is expected to retain its distinctive young population.

From Band 3 lettings data, the 5% quota of lets to Band 3 applicants as per the Allocations Scheme usually goes to applicants aged over 50 or those requiring older person's accommodation. These

applicants may be suitable for older person's accommodation for which there is low demand in the Borough. This is one element of social housing provision which is undersubscribed to in the Borough and delivered by registered providers (housing associations).

This proposal will have a neutral impact on applicants who will be removed from Band 3 of the CHR as their prospects of re-housing remain unchanged. This new limitation on Band 3 will ensure that scarce social housing resources go to those with the greatest need.

This change in would mean that a total of 1,453 applicants will be removed from Band 3 of the CHR. It is proposed that with effect from date that this proposed change goes live, the Common Housing Register will no longer accept applicants under the age of 50 who are adequately housed.

It is thought that this will not have a disproportionate impact on existing social housing tenants under the age of 50. Existing social housing tenants will be notified in advance by the Council that they will be excluded from the CHR and will have an opportunity to advise the Council of any change in their circumstances that could impact on their housing needs. If their circumstances have changed and they are no longer adequately housed or fall into one of the categories to be considered in priority housing need they may be eligible to remain on either Bands 1 or 2 of the CHR depending on their circumstances.

Even where these applicants are removed from the CHR, if their circumstances change later, applicants can reapply to join the CHR and their eligibility will be assessed of the basis of their circumstances at the point that they reapply.

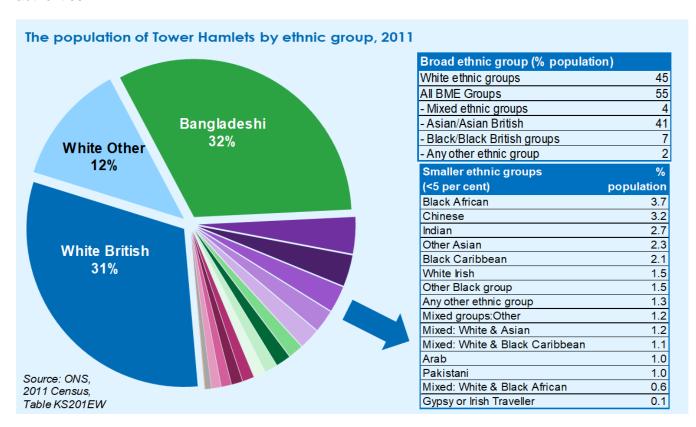
Applicants who are excluded from Band 3 of the CHR will be directed to alternative housing options as described in Appendix C of this document. In addition, there is a proposal to develop a new Intermediate Housing Register of interest which will provide residents priority for the initial three months of any new scheme being marketed. This gives residents with the opportunity to acquire an affordable home which they may purchase over the course of time. It will be an improved offer to those applicants who have the financial means to move towards home ownership.

From the date that Common Housing Register no longer accepts new adequately housed existing social housing tenants under the age of 50, it is proposed that those who are on the Band 3 of the CHR before this date, will be given a 'transitional period' of 6 months before being removed from the CHR.

All applicants who will be removed at the end of the transitional period will be contacted in advance of this change, in writing by the Housing Options Service. These applicants will be given the opportunity to advise officers if their circumstances have changed – which may mean that these applicants can move into either Band 1 or 2 of the CHR if they meet the eligibility criterion prescribed within the Council's Allocations Scheme. In the interim, during the transitional period, applicants excluded under this proposal can continue to bid for homes through the Council and its partner's choice-based lettings scheme, but as historical lettings data has shown, they would be extremely unlikely to successfully bid for a further social housing tenancy.

2) Race

More than two-thirds (69%) of the Borough's population belong to a minority ethnic group. Tower Hamlets is ranked as the 16th most ethnically diverse local authority in England out of 325 local authorities.



The Borough's two largest ethnic groups are the White British and the Bangladeshi populations, each accounting form one third of the population. Tower Hamlets has the largest Bangladeshi population in the country.

The third largest group is the White Other population, who account for 12% of the borough's population. This group is diverse and includes residents from a mix of ethnic backgrounds, Europeans, Australians and Americans.

A significant proportion of the borough's population are Somalian. The 2011 Census identified 2,925 Somali-born residents, 1.2% of the population. The overall size of the Somali population in the borough, including subsequent and second generations, is considerably larger, between 6,000 and 9,000 or 2-3% of the population.

Equalities data from 1st April 2020, in the table below, demonstrates the ethnicity of all applicants on Band 3 of the CHR.

Ethnicity - All ages	Total	Percentage
Asian	4,398	52%
Black	963	11%
Dual	213	3%
Other	469	6%
Declined	277	3%
White	2,131	25%
Total	8,451	

Regardless of race or ethnicity, historic lettings data over recent years shows that few existing social housing applicants under the age of 50 are successful in securing a further social housing tenancy. This proposed change will have a neutral impact on applicants without priority who are adequately housed as their prospects of re-housing remain unchanged.

This change would mean that currently a total of 1,453 applicants will be removed from Band 3 of the CHR. It is proposed that with effect from 1st April 2021, the Common Housing Register will no longer accept applicants under the age of 50 who are adequately housed.

These applicants will be directed to alternative housing options as described in Appendix C of this document. In addition, a new Intermediate Housing Register of interest has been proposed which will give residents priority for the initial three months of any new affordable housing scheme being marketed. This provides residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

From the date that Common Housing Register no longer accepts new adequately housed existing social housing tenants under the age of 50, it is proposed that those who are on the Band 3 of the CHR before this date, will be given a 'transitional period' of 6 months before being removed from the CHR.

Applicants who will be removed at the end of the transitional period will be contacted in advance and in writing by the Housing Options Service and informed of this change. These applicants will be given the opportunity to advise officers if their circumstances have changed – which may mean that these applicants can move into either Band 1 or 2 of the CHR if they meet the eligibility criterion prescribed within the Council's Allocations Scheme. While these applicants can continue to bid for homes through the Council and its partner's choice-based lettings scheme, they will, as demonstrate, be extremely unlikely to successfully bid for a further social housing property.

3) Gender

Tower Hamlets has around 14,000 more male residents than female residents. This is the 5th highest ratio of males to females in the country and is higher than the ratio in both London and UK where there are more females than males.

The Borough has 52.2% male residents and 47.8% female residents (ONS mid-year estimates 2018).

Analysis of Band 3 of the CHR (as of 1st April 2020), shows that there are 56% of female applicants compared to 43% make applicants hoping to be rehoused.

This proposal will have a neutral impact on applicants who are existing social housing tenants under the age of 50, regardless of their gender, who will be removed from Band 3 of the CHR as their prospects of re-housing remain unchanged This change will ensure that scarce social housing resources go to those with the greatest need. This is neutral impact on applicants without priority who are adequately housed as their prospects of re-housing remain unchanged.

These applicants will be directed to alternative housing options as described in Appendix C of this document. In addition, a new Intermediate Housing Register of interest has been proposed which will give residents priority for the initial three months of any new scheme being marketed. This provides residents with the opportunity to acquire an affordable home which they may purchase over the course of time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

From the date that Common Housing Register no longer accepts new adequately housed existing social housing tenants under the age of 50, it is proposed that those who are on the Band 3 of the CHR before this date, will be given a 'transitional period' of 6 months before being removed from the CHR.

During this transitional period, applicants who will be removed will be contacted in writing and in advance by the Housing Options Service and informed of this change. These applicants will be given the opportunity to advise officers if their circumstances have changed – which may mean that these applicants can move into either Band 1 or 2 of the CHR if they meet the eligibility criterion prescribed within the Council's Allocations Scheme. While these applicants can continue to bid for homes through the Council and its partner's choice-based lettings scheme for the duration of the transitional period, they are unlikely to successfully bid for a further social housing property.

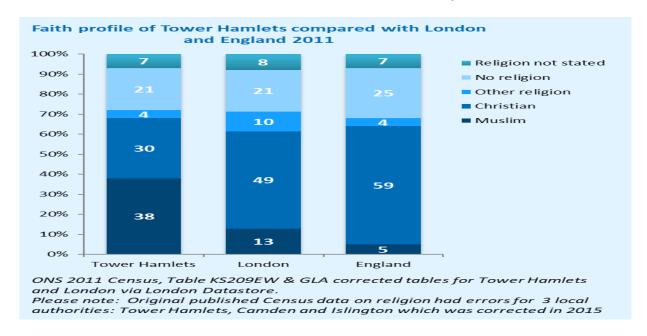
4) Gender Reassignment (Gender Identity): No information is held on gender reassignment.

There are no gender reassignment specific criteria within the current or proposed amendments to the Allocations Scheme. The Allocation Scheme makes no distinction between applicants who are the same sex as they were assigned at birth, and those who are or have transitioned.

Applicants can choose whether to disclose this information as part of the Council's equalities monitoring process. As of 1st April 2020, there are a total of two applicants who have answered that their gender identity is not the same as at birth. One applicant each from Transfer and SHR lists.

5) Religion and belief

Tower Hamlets has the highest number of Muslim residents in the country. Around 38% of the residents are Muslim, compared with 5% in England and 13% in London. Conversely, the borough has the lowest number of Christian residents with 30%, compared with 59% in England and 49% in London.



Information held on the religion or faith groups which Band 3 applicants currently identify with is shown in the table below (as of 1st April 2020). **This information is limited as the disclosure of this information is entirely voluntary on the part of the applicant.**

Religion – all ages	Count	Percentage
BUDDHIST	2	0.2%
CHRISTIAN	86	1.01%
HINDU	2	0.02%
JEWISH	6	0.07%
MUSLIM	477	5.6%
NO		0.11%
RELIGION	10	
OTHER	2	0.02%
REFUSED	89	1.05%
No Data	7,777	92%
Total	8,451	

Irrespective of religion or faith, this proposal can be considered to have a neutral impact on those CHR who would be excluded from Band 3.

These applicants will be directed to alternative housing options as described in Appendix C of this document. While there is the proposal to develop an Intermediate Housing Register of interest for applicants who are looking to move towards home ownership via Affordable/Intermediate Housing products, the Council recognises that there will be Muslim applicants who will be excluded from Band 3 of the CHR and will be unable to pursue this alternative housing option.

Applicants cannot use a Shariah mortgage to finance the purchase of a home through shared ownership or right to buy schemes. This is because Islamic home finance depends on the bank buying the home on the mortgager's behalf.

The charging of interest is forbidden under Islamic law, no lending or borrowing money. However, Help to Buy Schemes can be used by providers of home purchase plans and there are several banks and financial institutes which offer home purchase plans which are sharia compliant. The bank or institution purchase the property on behalf of the customer then lease or rent the property back to them, so the customer pays the mortgage back as rent, once the final instalment is paid, the property belongs to the customer.

Applicants who cannot apply for a conventional mortgage will be directed towards 'Help to Buy' products (through the Greater London Authorities webpage).

From the date that Common Housing Register no longer accepts new adequately housed existing social housing tenants under the age of 50, it is proposed that those who are on the Band 3 of the CHR before this date, will be given a 'transitional period' of 6 months before being removed from the CHR.

Applicants who will be removed at the end of the transitional period will be contacted in writing and in advance by the Housing Options Service and informed of this change. These applicants will be given the opportunity to advise officers if their circumstances have changed – which may mean that these applicants can move into either Band 1 or 2 of the CHR if they meet the eligibility criterion prescribed within the Council's Allocations Scheme. During the transitional period, these applicants can continue to bid for homes through the Council and its partner's choice-based lettings scheme, although they are extremely unlikely to successfully bid for a further social housing tenancy.

6) Sexual orientation

The information which is available on this protected characteristic is limited. Local authority level sexual identify experimental estimates published for 2013-15 estimate that 4.3% of the Tower Hamlets population identified as lesbian, gay or bisexual.

There is a deficit in the data held on the sexual orientation of residents within the Borough and residents are often reluctant to disclose this information. Applicants can choose if they wish to disclose this information.

Sexual Orientation - all ages	Count
BISEXUAL	6
GAY	2
HETEROSEXUAL	304
LESBIAN	1
REFUSED	210
No Data	7,928
Total	8,451

The Office for National Statistics are proposing to include a question on sexual orientation in 2021. Experimental estimates published by ONS for 2017, show that nationally 2% of the UK population aged 16 and over identify as LGB, regionally, people in London (2.6%) are more likely to identify as LGB.

Any issues brought to our attention will be dealt with sensitively on a case by case basis. We recognise that this is an elective process on the part of the tenant and the Council respects the confidence given to our officers when a tenant discloses this information to use.

It is not thought that this proposed amendment to Band 3 of the CHR will not have disproportionate or negative impact on existing social housing tenants under the age of 50 who identify with this protected characteristic.

The reality is that the existing social housing applicants under the age of 50 who are removed from Band 3 under this proposal, irrespective of any protected characteristic that they identify with, remain unlikely to ever secure an offer of a further social housing tenancy. These applicants are adequately housed and have some degree of settled accommodation. Limiting applicants in Band 3 will help to manage demand, ensuring that those in the greatest need continue to receive priority with the Housing Register more accurately reflecting housing need in the Borough.

Applicants who are removed from Band 3 will be directed to alternative housing options as described in Appendix C of this document. In addition, a new Intermediate Housing Register of interest has been proposed which will give residents priority for the initial three months of any new scheme being marketed. This will provide residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

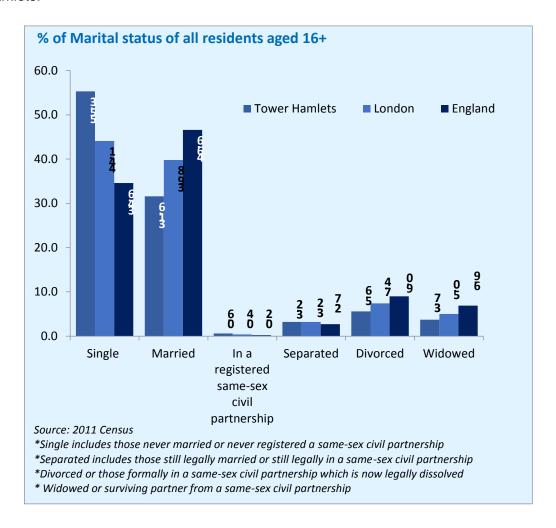
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7) Marriage and Civil Partnerships

The most recent data held on the marital status of residents in the Brough is from the 2011 Census. Tower Hamlets has significantly higher proportion of residents who are single compared to London and England. In 2011, 55.3% of residents were single, compared to 44.1% in London and 34.6% in England.

Nationally 46.6% of those aged 16 and over are married, compared to 39.8% in London and 31.6% in Tower Hamlets.



The Council does not regularly collect data on the marital status of council tenants, only at the point of entry on to the Housing Register and where a tenant signs up to a council tenancy agreement. This information can become unreliable and invalid over time.

It is not thought that this proposed amendment to Band 3 of the CHR will not have disproportionate or negative impact on existing social housing tenants under the age of 50 who identify with this protected characteristic.

Applicants who are excluded from the CHR will be directed to alternative housing options as described in Appendix C of this document. In addition, a new Intermediate Housing Register of interest has been proposed which will give residents priority for the initial three months of any new scheme being marketed. This provides residents with the opportunity to acquire an affordable home which they may purchase over the time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

From the date that Common Housing Register no longer accepts new adequately housed existing social housing tenants under the age of 50, it is proposed that those who are on the Band 3 of the CHR before this date, will be given a 'transitional period' of 6 months before being removed from the CHR.

Applicants who will be removed at the end of the transitional period will be contacted in writing and in advance by the Housing Options Service and informed of this change. These applicants will be given the opportunity to advise officers if their circumstances have changed – which may mean that these applicants can move into either Band 1 or 2 of the CHR if they meet the eligibility criterion prescribed within the Council's Allocations Scheme. During the transitional period, these applicants can continue to bid for homes through the Council and its partner's choice-based lettings scheme, they will as demonstrated be extremely unlikely transfer to another social housing property.

The reality is that the existing social housing applicants under the age of 50 who are removed from Band 3 under this proposal, irrespective of any protected characteristic that they identify with, remain unlikely to ever secure an offer of a further social housing tenancy. These applicants are adequately housed and have some degree of settled accommodation. Limiting applicants in Band 3 will help to manage demand, ensuring that those in the greatest need continue to receive priority with the Housing Register more accurately reflecting housing need in the Borough.

8) Disability

The housing needs survey carried as part of the 2014 Strategic Housing Market Assessment (SHMA) estimated there are:

- 20,293 households that contain at least one household member with a disability or limiting long term illness;
- 1.7% of households said that they have a support need;
- 10.5% of households said that their home had been adapted to meet the needs of a household member with a disability.

The proposal to exclude existing social housing tenants over the age of 50 will not affect applicants who are disabled and have a medical or priority need for alternative suitable accommodation or a ground floor or wheelchair accessible property. Applicants who are eligible are routed into Band 1 (Group A) of the CHR. This is the highest priority award and will normally be considered where the criteria for a priority medical award is met and one or more of the following conditions also applies:

- someone is in hospital and cannot return home because it is not suitable
- there is a risk to life
- there are very exceptional circumstances

Alternatively, some applicants who are considered to have a priority medical need, normally where the applicant or some someone in their household has a severe long-term limiting illness or permanent and substantial disability will be placed in Group B of Band 1 of the CHR.

The Band and group which applicants are placed in is dependent on the information given at the time of their application or following any changes in an applicant or their household's circumstances.

Prior to the proposal to limit existing social housing tenants (under the age of 50) who are adequately housed from Band 3 of the Common Housing Register, all affected applicants will be notified of the change to this banding and given an opportunity to inform the Council if there has been a change in their circumstances which requires that the applicant be considered for a move into either Band 1 or 2 on the CHR.

The Council continues to recognise that there are times when people need to move because of their health or a disability. Existing social housing tenants under the age of 50 will be notified in advance by the Council that they will be excluded from the CHR and will have an opportunity to advise the Council of any change in their circumstances that could impact on their housing needs. If their circumstances have changed and they are no longer adequately housed and fall into one of the categories to be considered in priority housing need they may be eligible to remain on either Bands 1 or 2 of the CHR depending on their circumstances.

Even where these applicants are removed from the CHR, if their circumstances change at a later date, applicants can reapply to join the CHR and their eligibility will be assessed of the basis of their circumstances at the point that they reapply. be able to reapply to join the Common Housing Register and their application to join will be considered in accordance with the eligibility criteria set out in the Council's Allocation Scheme.

9) Pregnancy and maternity

The only data which the Council collects for this protected characteristic is due dates for pregnancy, usually collected at the point of entry to the Common Housing Register and again at the point when a tenant signs up for a Council Tenancy. This data is used to ascertain the size of the Property/the number of bedrooms a tenant requires under the 'bedroom standard'. The circumstances of the applicants and existing social housing tenants will always be considered when prioritising and allocating social housing and they will be expected to ensure that their information and circumstances are updated as and when they change.

It is thought that this will not have a disproportionate impact on this protected characteristic. Existing social housing tenants will be notified in advance by the Council that they will be excluded from the CHR and will have an opportunity to advise the Council of any change in their circumstances that could impact on their housing needs. If their circumstances have changed and they are no longer adequately housed or fall into one of the categories to be considered in priority housing need they may be eligible to remain on either Bands 1 or 2 of the CHR depending on their circumstances.

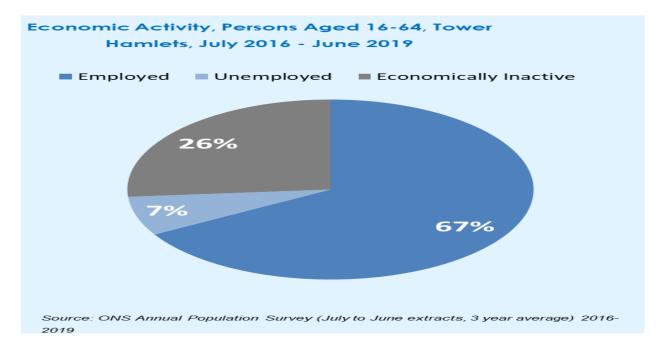
Even where these applicants are removed from the CHR, if their circumstances change at a later date, applicants can reapply to join the CHR and their eligibility will be assessed of the basis of their circumstances at the point that they reapply.

10) Socio-economic

During 2016-19, around two thirds of Tower Hamlets working age population were in employment- 67% that is around 7% below the employment rate in London and 8% below the employment rate in Great Britain.

One third of the working age population were not in employment, this comprised of:

- Unemployed and actively seeking work (7%); and
- Economically inactive (26%) (this includes residents who are caring for family, or too sick to work, residents in full time education and those who would like to work



The proposal to remove existing social housing tenants under the age of 50 from the CHR is thought not to have a negative or disproportionate effect on the socio-economic status of existing social housing tenants under the age of 50 in Band 3 of the CHR.

Existing social housing tenants already pay a 'social rent' either to a council or a housing association, this means that their rents are lower than rents for similar properties in the private sector. It will not financially disadvantage those social housing tenants who retain their tenancy.

The current COVID-19/Coronavirus pandemic is likely to compound the pre-existing economic pressures households face particularly as people are made redundant, furloughed or see a reduction in their working hours, and this may create further pressures on the demand for social housing as residents may face difficulty in paying their monthly rent or meeting mortgage payments. The Council, its partner Tower Hamlets Homes and Common Housing Register Registered Provider partners will work with our existing social housing tenants to ensure that their tenancies are sustained and that they are able to maximise income opportunities to negate any arrears of rent. There is greater security of tenure for social housing tenants than for those tenants who rent privately or who for residents who own their own home.

This proposed change to Band 3 will ensure that scarce social housing resources go to those with the greatest need, which is likely to become increasingly critical in the aftermath of the pandemic

Existing social housing applicants under the age of 50 will be directed to alternative housing options as described in Appendix C of this document. In addition, a new Intermediate Housing Register of interest has been proposed which will afford all residents' priority for the initial three months of any new affordable housing scheme in the Borough being marketed. This provides Borough residents with an opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

From the date that Common Housing Register no longer accepts new adequately housed existing social housing tenants under the age of 50, it is proposed that those who are on the Band 3 of the CHR before this date, will be given a 'transitional period' of 6 months before being removed from the CHR.

Applicants who will be removed at the end of the transitional period will be contacted in writing and in advance by the Housing Options Service and informed of this change. These applicants will be given the opportunity to advise officers if their circumstances have changed – which may mean that these applicants can move into either Band 1 or 2 of the CHR if they meet the eligibility criterion prescribed within the Council's Allocations Scheme. During the transitional period, these applicants can continue to bid for homes through the Council and its partner's choice-based lettings scheme, although they will be extremely unlikely to successfully bid for a further social housing property.

Even where these applicants are removed from the CHR, if their circumstances change at a later date, applicants can reapply to join the CHR and their eligibility will be assessed of the basis of their circumstances at the point where they reapply.

Target Groups	Impact – Positive or Adverse	Reason(s)
	What impact will the proposal have on specific groups of service users or staff?	
Race	Neutral	The proposal to remove existing social housing tenants under the age of 50 will have a neutral impact on this cohort of applicants, regardless of any protected characteristics which these applicants identify with. Data over recent years demonstrates that barely any applicants within this segment of the Band 3 will ever realistically be offered a further social housing tenancy, on the basis that these applicants have been assessed as adequately housed with no priority housing need as their prospects of being rehoused remain unchanged. This change will ensure that scarce social housing resources go to those with the greatest need.
Disability	Neutral	The proposal to exclude existing social housing tenants over the age of 50 will not affect applicants who are disabled and have a medical or priority to need for alternative suitable accommodation, or a ground floor or wheelchair accessible property. Applicants who are eligible are routed into Band 1 (Group A) of the CHR. This is the highest priority award and will normally be considered where the criteria for a priority medical award is met and one or more other eligibility conditions are met.
Gender	Neutral	This proposal will have a neutral impact on applicants who will be removed from Band 3 of the CHR as their prospects of rehousing remain unchanged This change will ensure that scarce social housing resources go to those with the greatest need. This is neutral impact on applicants without priority who are adequately housed as their prospects of re-housing remain unchanged.
Gender Reassignment	Neutral	The Allocation Scheme makes no distinction between applicants who are the same sex as they were assigned at birth, and those who are or have transitioned. Existing social housing applicants under the age of 50 who are considered adequately housed without any priority housing need, have no realistic chance of being offered a further social housing tenancy.
Sexual Orientation	Neutral	It is thought that this proposed amendment to Band 3 of the CHR will not have disproportionate or negative impact on existing social housing tenants under the age of 50 who identify with this protected characteristic. The reality is that the existing social housing applicants under the age of 50 who are removed from Band 3 under this proposal, irrespective of any protected characteristic that they identify with, remain unlikely to ever secure an offer of a further social housing tenancy. These applicants are adequately housed and have some degree of settled accommodation. Limiting applicants in Band 3 will help to manage demand, ensuring that those in the greatest need continue to receive priority with the Housing Register more accurately reflecting housing need in the Borough.
Religion or Belief	Neutral	Irrespective of religion or faith, this proposal can be considered to have a neutral impact on those CHR who would be excluded from Band 3. These applicants will be directed to alternative housing options as described in Appendix C of this document. While there is the proposal to develop an Intermediate Housing Register of interest for applicants who are looking to move towards home ownership via Affordable/Intermediate Housing products, the Council recognises that there will be Muslim applicants who will be excluded from Band 3 of the CHR and will be unable to pursue this alternative housing option. Applicants who cannot apply for a conventional mortgage will be directed towards 'Help to Buy' products (through the Greater London Authorities webpage).

Age	Neutral	While the decision to remove existing social housing tenants under the age of 50 from Band 3 of the CHR may initially appear on face value to discriminate against residents under the age of 50 by allowing those applicants who are over 50 to remain within Band 3, historical evidence from lets made to Band 3 show that very few new social housing tenancies are granted to those in Band 3. The majority of lets to applicants in Band 3 are made to applicants over the age of 50, and typically the units let to this cohort are properties designated as accommodation for applicants over 50 or as sheltered accommodation. These are usually one-bedroom units. Existing social housing tenants under the age of 50 in Band 3 are already designated adequately housed and are not in the reasonable preference ambit of the Allocations Scheme – their housing needs are met.
Marriage and Civil Partnerships	Neutral	It is not thought that this proposed amendment to Band 3 of the CHR will not have disproportionate or negative impact on existing social housing tenants under the age of 50 who identify with this protected characteristic.
		Applicants who are excluded from the CHR will be directed to alternative housing options as described in Appendix C of this document. In addition, a new Intermediate Housing Register of interest has been proposed which will give residents priority for the initial three months of any new scheme being marketed. This provides residents with the opportunity to acquire an affordable home which they may purchase over the time. This will be an improved offer to those applicants who have the financial means to move towards home ownership
Pregnancy and Maternity	Neutral	It is thought that this proposed change will not have a disproportionate impact on this protected characteristic. Existing social housing tenants will be notified in advance by the Council that they will be excluded from the CHR and will have an opportunity to advise the Council of any change in their circumstances that could impact on their housing needs. If their circumstances have changed and they are no longer adequately housed or fall into one of the categories to be considered in priority housing need they may be eligible to remain on either Bands 1 or 2 of the CHR depending on their circumstances.
Socio- economic	Neutral	The proposal to remove existing social housing tenants under the age of 50 from the CHR is thought not to have a negative or disproportionate effect on the socio-economic status of residents in Band 3 of the CHR. Existing social housing tenants already pay a 'social rent' either to a council or a housing association, this means that their rents are lower than rents for similar properties in the private sector. It will not financially disadvantage those social housing tenants who retain their tenancy.
		This change will ensure that scarce social housing resources go to those with the greatest need. This is neutral impact on applicants without priority who are adequately housed as their prospects of re-housing remain unchanged.

Section 4 - Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence or view that suggests that different equality or other protected groups (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

Yes? No? X

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added / removed? N/A

(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. An EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)

Where you believe the proposal discriminates but not unlawfully, you must set out below your objective justification for continuing with the proposal, without mitigating action.

N/A

Section 5 - Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes? X No?

How will the monitoring systems further assess the impact on the equality target groups?

The monitoring of these proposals and their impact on the supply of social housing in the Borough will be used to inform future revisions of the Council's Allocations scheme This information will be used to inform future operational practice to mitigate any unintended disproportionate consequences arising from the proposed changes to the Council's Allocation Scheme

Does the policy/function comply with equalities legislation? (Please consider the OTH objectives and Public Sector Equality Duty criteria)

Yes? X No?

If there are gaps in information or areas for further improvement, please list them below:

There is a deficit in the data that the Council holds on the following protected characteristics:

- Sexual Orientation
- Gender Reassignment
- Marriage and Civil Partnerships
- Pregnancy and Maternity

How will the results of this Equality Analysis feed into the performance planning process?

While staff endeavour to capture as much data as possible on applicants' protracted characteristics, which is recorded on the Council's IT systems, it is an elected process where applicants may choose not to provide or refuse. Some of the information held is variable e.g. pregnancy, which means applicants must update the service for their application to be reviewed, which will be done as part of any change of circumstances process.

An effective communication campaign will be launched to ensure tenants consider all the alternative housing options available to them. There will be a transitional period of 6 month before existing social

tenants less than 50 years of age are removed from Band 3. Those affected will be informed and offered the opportunity to report any change of circumstances which will have to be processed. This will be closely monitored and diversity information updated as necessary

Staff including those employed by our partner RPs will be briefed on the policy changes, any changes needed on IT systems and application processes.

Regular performance statistics on demand and lets will be produced including diversity information and monitored by senior management to ensure any gaps or adverse impact can be addressed.

Section 6 - Action Plan

As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Review our mutual exchange arrangements with the Borough's registered providers who operate in the Borough.	Ensure that barriers to tenants exchanging are minimised.	Determine which exchange schemes registered providers are signed up to.	Sue Hammick	
RP partners to consider setting aside a budget for tenants who transfer or swap to meet some of the costs associated with moving home and/or provide financial assistance towards redecorating the property to settle tenants.		To be raised at CHR Forum 7 th July 2020.	Rafiqul Hoque	
Prior to the implementation of this proposal, an exercise should be completed to identify all applicants seeking a transfer or exchange to ensure that they are approached and targeted at events such as the Swap days, again to be promoted amongst providers and THH.	Work with RPs and THH homes to target those applicants who want transfer to another social housing property for attendance at future Swap Day events facilitated by the Council and its partners.	Provide a Homeswappers open day for residents affected by policy change by end of March 2021.	Sue Hammick/Julius Adeyemi	
Develop and improve information on alternative housing options around mutual exchange/swap schemes.	Amend and update the Council's Home seekers website, Homeseekers website and Ask Mo.	Changes to websites agreed by CHR partners by end of August 2020.	Sue Hammick	
Agree a transitional period of 6 months to allow affected applicants to remain on the CHR while an IHR is developed and to report any change of circumstances.	To be included in report to Cabinet.	All affected applicants written to by October 2020. Any change of circumstances reviewed and completed by March 2021.	Rafiqul Hoque	
Contact all existing social housing tenants to inform them that the Council will be removing them from Band 3 of the CHR.	Publicity campaign – email, letter to all residents, with the option to review an applicant 's circumstances.	All affected residents to be contacted by end October 2020.	John Harkin	

Appendix A

(Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	Suspend – Further Work Required	Red
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green:

Appendix B

List of Registered Provider Partners to the Common Housing Register and current social housing stock available within the London Borough of Tower Hamlets as of 3rd March 2020

	Total Stock
Arhag Housing Association (joined	
01/07/2018). Stock level as of 20 Nov	
2018)	901
LBTH - Council - (stock figure 27 June	
2019)	11,476
Gateway	1,728
HARCA (stock figure 08 July 2019)	5,972
Spitalfields -	850
SWAN (stock figure 08 July 2019)	1,615
THCH	2,003
Southern (stock figure 27 June 2019)	1,382
One Housing	2,752
Clarion Housing Group (comprised of	
merged Old Ford, Circle 33 and Affinity	
Sutton stock) (stock figure 16 July 2018)	3,965
Providence Row HA	102
Eastend Homes (stock figure 25	0.040
January 2018)	2,248
Metropolitan Housing Trust	121
London & Quadrant	1,541
Network Homes (formerly Network	400
Stadium)	122
Peabody (stock figure 01 July 2019)	2,139
Notting Hill Genesis (stock figure 27	
June 2019)	1,290
Newlon Housing Trust (stock figure 03	
July 2019)	737
North London Muslim Housing	
Association (stock figure 08 July	
2019)	39
NON-PARTNER RSL'S (Stock figure	
as of May 2018). EB Feb 2018:	
Awaiting updated stock figures.	1,999
All	42,982

Appendix 3
Alternative housing options for applicants excluded under the current proposal

Housing Option	Type of Applicant	Offer
Affordable Housing via Intermediate Housing Register	Available to all residents who are working with income below £60,000 for intermediate rent and below £90,000 for shared ownership products who meet the prescribed qualifying criterion, looking to stay in the borough as renters or who are looking to secure their first steps towards home ownership.	Officers are currently seeking approval from members to develop an Intermediate Housing Register for applicants who may or may not be eligible to join the Housing Register but who may have the financial means and meet the eligibility criterion to access any intermediate housing products as soon as they become available for marketing. Regardless of whether the proposal to exclude existing social housing tenants under the age of 50 from Band 3 is agreed, there is a need to encourage and promote this offer to residents in the Borough who have the financial capability to move into intermediate housing.
Mutual Exchange https://www.homeswapper.co.uk/ https://www.houseexchange.org.uk/	Social Housing (council and register provider tenants)	This provides a more realistic prospect of moving as opposed to being on the register and bidding for homes. This applies to applicants in all bands on the CHR. The Mutual Exchange sites used (House Exchange and Homeswapper) are national websites which Tower
Housing Moves https://www.housingmoves.org/	Social Housing (council and register provider tenants)	Hamlets council tenants can access free of charge. This is a Pan-London Mobility Scheme for social housing tenants (council and registered provider tenants) to move outside their borough to a different London borough. Run by the GLA, the majority of London Boroughs and registered providers participate in this scheme. The following applicants are prioritised within this scheme: Households who have more bedrooms than they need; or Applicants who need to move closer to employment or high education; or Applicants who are overcrowded in their home or need to move due to caring responsibilities.
Homefinder https://homefinderuk.org	Social Housing (council and register provider tenants) and homeless applicants	This is a national housing mobility scheme that helps tenants and homeless households, who want or need to move, to find a home that better matches their household size and personal and financial circumstances.
Seaside and Country Homes https://www.london.gov.uk/what- we-do/housing-and-land/council- and-social-housing/seaside-and- country-homes	Council or registered provider tenants where one tenant where at least one member of the household is age 55 or above	Helps households to move from London each year to bungalows or flats in desirable seaside and countryside locations. The scheme is open to people living in council or register provider homes in London where at least one member of the household is age 55 or above; they must be either the partner, joint tenant or registered carer of the lead

		applicant. Second applicants aged under 55 are not able to become joint tenants of, or have succession rights to, Seaside and Country Homes properties.
Accommodation in the Private Rent Sector	Available to all residents	The Tower Hamlets Homeseekers website will be expanded to include information on renting in the private sector - information on finding reputable landlords, a checklist on what to consider before committing to a tenancy, information on the Tenants Fee's Act, the right to rent, Local Housing Allowance rates and how to claim universal credit/housing benefit.