

# Equality Analysis (EA)

Financial Year  
2020/21

See  
**Appendix A**  
Current decision  
rating



## Section 1 – General Information (Aims and Objectives)

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

This review of the Housing Allocations Scheme has been carried out in accordance with the Localism Act (2011). The Allocation Scheme provides details of how the Council allocates its social housing stock. 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, local authorities are not required to keep this 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 review are:

1. **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 account of the various Codes of Guidance on Allocations Schemes as issued by the Government.<sup>1</sup>
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

A total of 19 registered providers operating within the Borough subscribe to the Allocations Scheme. Their details can be found in Appendix B of this document.

This revision of the Allocation Scheme brings new policy proposals which will encourage people to release the properties they no longer need, to provide greater assurance that our limited provision of properties is allocated to the most appropriate applicant and to ensure that the Council utilises the limited opportunities within the wider housing market.

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 to meet housing needs in the Borough.

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

<https://www.gov.uk/government/publications/allocation-of-accommodation-guidance-for-local-housing-authorities-in-england-published> 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](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

There are four proposed changes to the Council's Allocations Scheme, and these are set out below:

**Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period.**

People who are homeless, or who are at risk of becoming homeless, are sometimes able to secure private housing outside Tower Hamlets to resolve their homelessness. This is necessary to make best use of all suitable available housing across London.

Currently, a person rehoused outside the Borough would be removed from the Common Housing register because they would no longer meet the criteria; to have lived in Tower Hamlets for three years before being eligible for a property.

Applicants who are homeless and owed a duty are prioritised for housing and this applies to applicants owed a prevention and relief duty under the new homeless legislation.

This proposal would change the rules so that if someone was able to secure suitable and affordable housing outside the Borough because they had either become homeless or were at risk of becoming homeless, and homelessness was prevented with assistance from the Council, they would not be penalised by being removed from the Common Housing Register.

Under this proposal, these applicants will be allowed to remain on or join the register for three years only, if the end of the three-years, these applicants are not rehoused, they will be taken off the Common Housing Register. Allowing three-years to remain on the Common Housing Register gives these applicants an opportunity to either be offered a suitable property back in Tower Hamlets, or to have acquired eligibility, having lived in their new borough for long enough, to join the housing register and bid for a property in their new borough.

This proposal would provide applicants the opportunity to join (before a full housing duty is owed) and/or remain on the Common Housing Register for three years and would require these applicants to actively bid for available homes. It is intended that this will have:

- A positive impact on homeless applicants who will currently be removed or barred from the housing register because they no longer live in Tower Hamlets.
- A reduction in the number of vulnerable people being housed in expensive private sector accommodation in Tower Hamlets and experiencing rent arrears.
- Applicants will have more choice with PRS housing as a solution compared to emergency temporary accommodation placements by the Council.
- Future MHCLG funding is likely to be linked to the number of preventions the council achieves.

Before an out of borough placement is made, consideration is given as to whether the property is suitable for the applicant (and their household), considering any special needs and affordability before an offer is made. The Council adheres to the principles and guidance in the Homelessness Code of Guidance for Local Authorities

**Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.**

Under the current rules, if a council tenant or housing association tenant is living above the first floor, they will not be given priority for a move to a property on the ground floor unless there are health reasons for doing so.

This proposal will give priority to existing social housing tenants living in homes on the first floor or above, with more bedrooms than they need. Changing this policy will make larger sized homes available to families that need the additional space, while helping those working-age social tenants who are currently affected by the 'bedroom tax' to downsize. It will also allow officers to use their discretion to ensure the best outcome is achieved, to meet competing priorities.

Average waiting time in years						
	Studio	1 Bed	2 Bed	3 Bed	4 Bed	5+ Beds
Band 1	2	3	3	5	6	6
Band 2	3	4	5	9	13	12
Band 3	10	6	7	no lets	no lets	no lets

Current demand on the Common Housing Register (3<sup>rd</sup> March 2020) shows that across all protected groups, there is a continued and greater demand for 2 or more-bedroom properties:

**Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.**

A limited number of ground floor flats become available each year. Under the current rules, lettings officers must make their allocation decision based only on whether an applicant has higher or lower priority in their band when they match on the shortlist. This proposal would allow officers to also consider medical factors like whether an applicant can manage internal stairs and give preference accordingly.

By allowing officers the discretion to take a balanced approach this will ensure clients requiring ground floor flats on medical grounds (in short supply) are prioritised taking their medical and other circumstances into account.

**Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)**

Under the current rules, victims of domestic abuse who have not lived in Tower Hamlets for the previous three years are placed on the Housing Register in band 2B. Many of them have needed to move to a new area for their own safety, so this proposal will waive the residential criteria meaning they could be placed in Band 2A instead. This proposal could lead to faster rehousing times for victims of domestic abuse.

This proposal will reduce the amount of time that domestic abuse victims who have found safety in refuges need to have been in the Borough before being eligible for housing, under the current rules they need to be in the refuge for six months, this proposal would cut that to three months .

It is intended that the proposed policy amendments will ease the disruptions suffered by victims of Domestic Abuse who become homeless and ensure that they are offered suitable long-term housing more quickly, also releasing refuge properties more quickly for others that need it.

Local authorities can consider the need to provide for other appropriate exceptions from their residency requirements, in order to take account of special circumstances, including providing protection to people who need to move away from another area to escape violence or harm. The Statutory Code of Guidance on Allocations (2012) provides for this.

Paragraphs 19 and 20 ensure that those who need to move between local authority districts in order to escape domestic abuse are not disadvantaged by a residency or local connection test. It is also important that victims of domestic abuse who are provided with temporary protection in a refuge, or other form of temporary accommodation, are given appropriate priority under a local authority's allocation scheme, to enable them to move into more suitable settled accommodation, releasing valuable refuge spaces for others.

In November 2018, the Government issued new statutory guidance for local authorities to improve access to social housing for victims of domestic abuse. The new guidance intends to ensure that victims of domestic abuse can move into social housing from a refuge or other form of temporary accommodation. The guidance strongly encourages local authorities to exempt from their residency requirements those who are currently living in a refuge or other form of temporary accommodation having escaped from domestic violence in another local authority area, and sets out how local

authorities can give appropriate priority for social housing to those who are currently living in a refuge or other form of temporary accommodation, by applying the homelessness or medical and welfare reasonable preference requirements .

Households at risk of domestic abuse often must leave their homes and the area where they have lived. This proposal adds to the Council's commitment to supporting victims of domestic abuse. It recognises that there is a clear need for victims of abuse and their children to be able to travel to different areas in order for them to be safe from the perpetrator, and as a local housing authority, the Council acknowledges that it should extend the same level of support to those from other areas as they do to their own residents.

### **Equalities duties on the Council**

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 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 partnership. The intention of this equality's assessment is to give consideration of the proposed changes to the 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 will suggest appropriate mitigation actions where necessary.

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

Based on the findings detailed below of this equality analysis, these proposed changes to the Allocations Scheme are not considered to have a negative or detrimental impact on residents (in this context, existing social housing tenants or applicants waiting for an allocation of social housing on the Common Housing Register).

For future applicants it is anticipated that these changes will enable the Council to make the best use of the Borough's social housing stock providing a greater level of security and reassurance to our residents that the Council are managing the limited supply of social housing within the statutory provisions set out by the Government.

**Name:** Rafiqul Hoque

**Date signed off:** 15<sup>th</sup> June 2020

**Service area:** Place

**Team name:** Housing Options

**Service manager:** Rafiqul Hoque, Head of Housing Options

**Name and role of the officer completing the EA:** Una Bedford, Strategy & 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?**

Equalities data has been extracted from the Council's Borough profiling dat. This is extracted from a variety of sources including the Office of National Statistics, the GLA Datastore and Census 2011. In addition, data has been taken from the Council's Housing Options Service regarding lettings in the Borough.

It is important to note that there are some information gaps in the data available to the Council. This is because the decision to disclose equalities information is down to individual and personal choice and residents may be reluctant to share this information.

Certain types of information which the Council holds can vary and change over the course of an applicant's time on the CHR. One example is pregnancy, which is reliant on the applicant updating 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 and they will have the opportunity to report any change of circumstances which will have to be processed. This will be closely monitored, and diversity information will be 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 3 – Assessing the Impacts on the 9 Groups

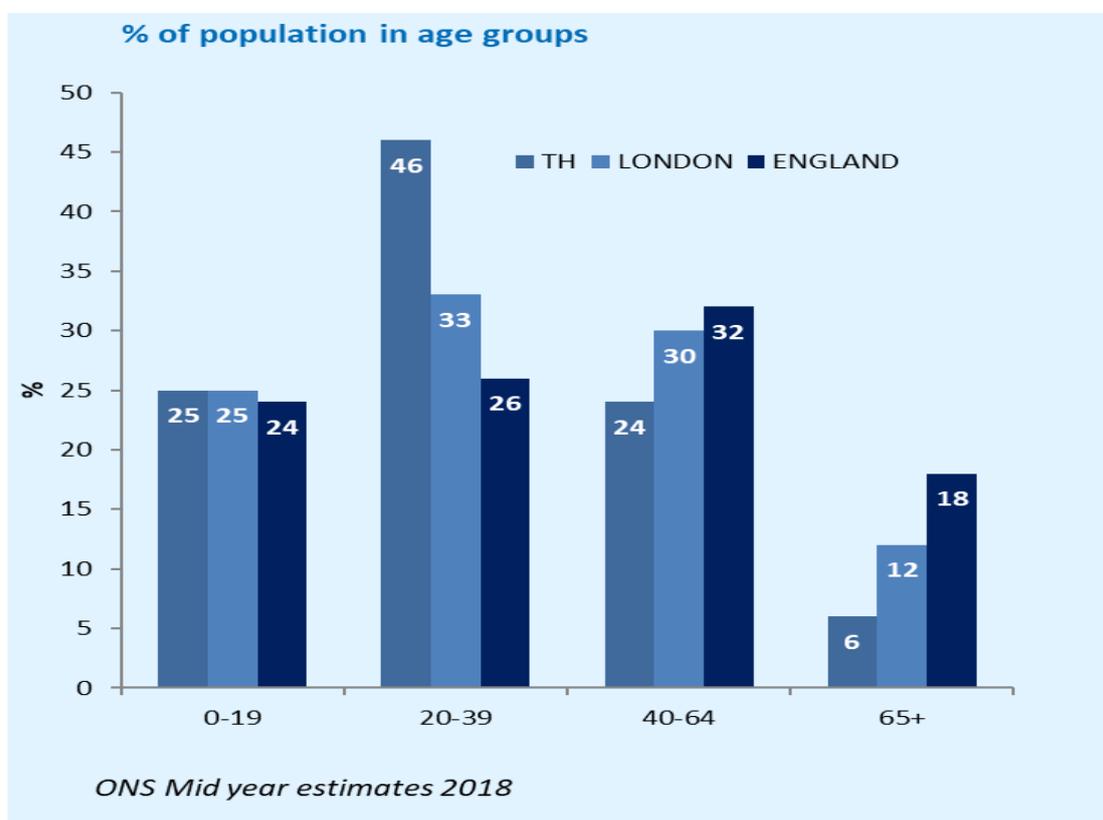
### 1) Age

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.1 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.

**Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.**

This will have a positive impact on all applicants who are threatened with homelessness or who present as homeless.

While people of all ages could be at risk of homelessness, the Council's homeless demand data shows that at local level, working age households with children in the younger age range are at an increased risk of homelessness. Applicants aged between 26-40 represent 53.4% on the Council's temporary rehousing list as at September 2019.

Under the Council's current policy, applicants cannot join the Common Housing Register (CHR) unless they have been a local resident for at least three years and/or are in housing need.

The Council proposes to allow those who have been placed out of the borough into the PRS under its duty to prevent homelessness to remain on the housing register for three years.

This change in policy will benefit homeless applicants of all ages who are placed in the PRS. At present, homeless applicants placed in out of borough PRS accommodation would be removed from the Housing Register because they no longer live in the Borough. Amending this policy will allow homeless applicants the opportunity to remain on the Common Housing Register while they are laying down roots in their new area. If their circumstances change or they are unable to settle, the applicant and their household will not have lost their connection to the Borough.

The Council would prefer to provide accommodation in the Borough wherever possible, but this is not always achievable due to the realities of the housing market and demand for accommodation. Placing homeless applicants and their households into PRS accommodation offers alternative, good quality accommodation at affordable rents as opposed to prolonged periods currently spent in emergency nightly charged placements.

The lack of affordable housing and impact of the ongoing welfare reforms mean that some households will need to move out of the Borough and/or out of London. This is more likely to affect larger families and those not in settled employment.

**Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.**

The current Allocation Scheme gives preference for ground floor homes to management transfers, decants and under-occupying social tenants on a 'like for like' basis, or on medical grounds if an applicant cannot manage above the ground floor. The table below illustrates the number of council tenants as at 3rd March 2020 who are under-occupying their property by the number of bedrooms above their housing need.

Bedroom	
-1	992
-2	231
-3	32
-4	7
-5	1
<b>Grand Total</b>	<b>1263</b>

***Source: Housing Data Management System Report (3<sup>rd</sup> March 2020)***

From this data on under-occupation, there are a total of 1263 applicants. Of these applicants, 534 (42%) are 60 or older and 315 (25%) are between 50 and 59 years old.

The Council proposes to amend the policy to allow under-occupying social housing tenants on the first floor or above, who have no medical needs, to be considered for moves to ground floor homes. This will release much needed larger size home – critically 2, 3- and 4-bedroom properties and help under-

occupying working-age tenants in receipt of housing benefits who are affected by the bedroom tax with their housing costs and potentially facilitate more chain-lettings. Both working age and pension age existing social housing tenants who chose to downsize may benefit from having lower/reduced utility bills as a result of moving to a smaller home.

**Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.**

There are only a limited number of ground floor flats which become available to let each year, with three bedrooms and larger size properties particularly scarce. Last year, (2018–2019), out of the 202 ground floor flats that were let, only one was a three-bedroom property and only two were four-bedroom units.

A possible scenario when shortlisting for four-bedroom ground floor flat that becomes available to let is explained below.

*Applicant 1 needs a four-bedroom ground floor flat on medical grounds but **can manage internal stairs within a property***

*Applicant 2 also needs a four-bedroom ground floor flat on medical grounds **but cannot manage internal stairs***

Under the current policy, applicant 2 has less priority in Band 1 than applicant 1 and is lower down on the shortlist. Under the current Allocation Scheme, applicant 2 would not be shortlisted for the property, even though applicant 2 cannot manage the stairs.

In the proposed policy, an officer would be able to bypass applicant 2 and offer to applicant 1 if the applicant or a member of their households has a condition which makes the property unsuitable.

As at 3<sup>rd</sup> March 202, there are 231 applicants on the common housing register requiring ground floor only accommodation on medical grounds. 148 of these applicants requiring ground floor only accommodation are aged 60 or older.

It is not possible to identify how many of these applicants need a property without internal stairs; this would only be identified by officers prior to making an offer of a property through the recommendations of medical advisors.

**Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)**

The present Allocation Scheme allows victims of domestic abuse to be accepted on to the CHR through the homeless route, but they are placed in band 2B if they do not meet the three-year residency criteria.

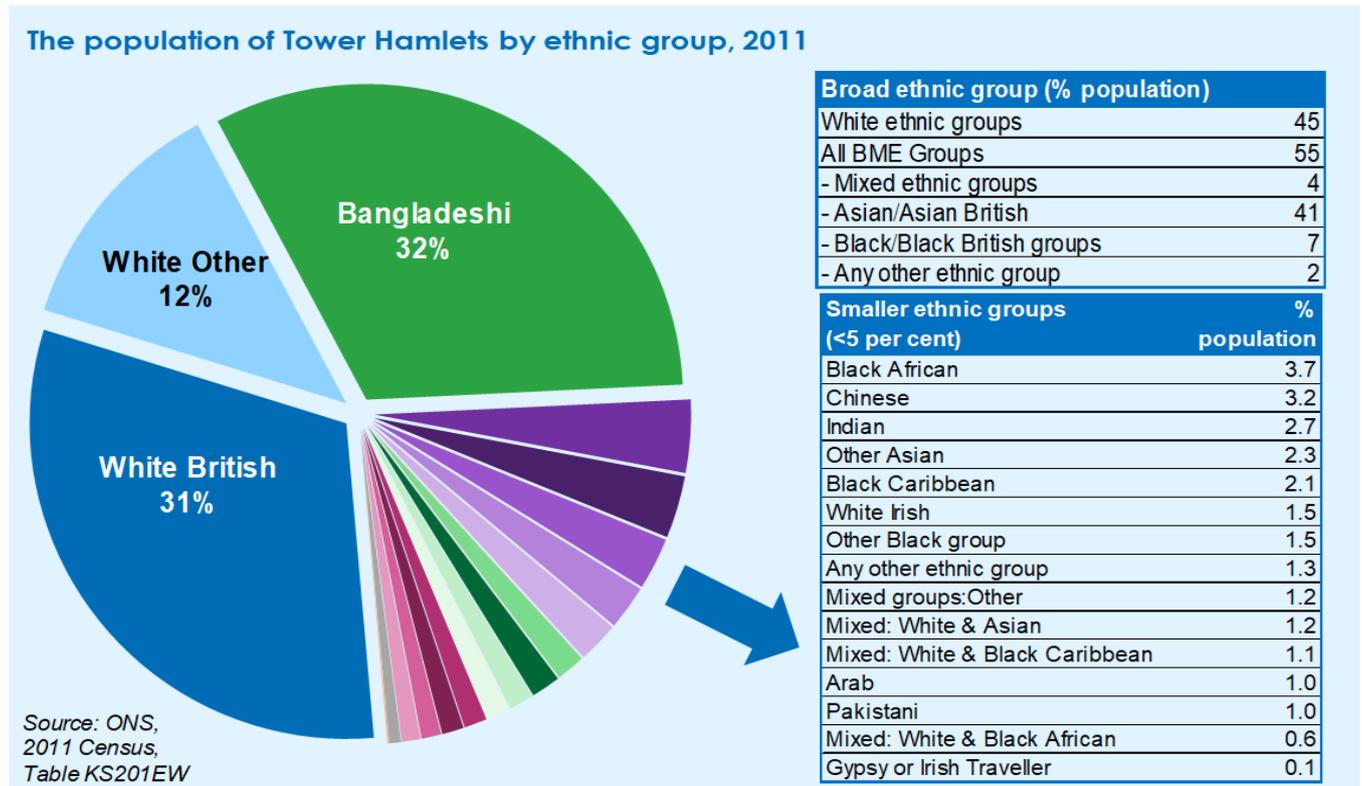
The Council propose to remove the three-year residency criterion for victims of domestic abuse who have been accepted as homeless. This will place applicants in the same category as other homeless applicants 2A.

The Council also proposes to prioritise applicants in refuges as part of the quota for applicants moving on from supported accommodation (through Band 1B), reducing the minimum residence criterion from six months to three months in the Borough. This will have a positive impact on age groups because this would free-up vacancies in refuges for other victims of domestic abuse, providing longer term settled accommodation to victims and their families who move on to a secure or assured social housing tenancy.

Officers will be given authority to prioritise applicants recommended a flat by health advisors on medical grounds.

## 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 for 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 Somali. 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.

**Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.**

This will have a positive impact on all applicants who are threatened with homelessness or who present as homeless irrespective of an applicant's ethnicity who have been placed by the Council into out of Borough PRS accommodation. Applicants will have some reassurance that they can remain on our Common Housing Register while establishing new roots in the Borough where they have been placed. At the end of the three years, these applicants will have had ample opportunity to either be offered a suitable property back in Tower Hamlets, or to have acquired eligibility, having lived in their new borough for long enough, to join the housing register and bid for a property in their new borough.

**Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.**

This proposal will have positive aspect on all families irrespective of which protected group they identify with. There is a higher proportion of BME households registered on the Common Housing Register. They are generally accepted as being more likely to be in overcrowded situations and to have larger households.

Properties of three or more bedrooms are always the most sought after and by encouraging under-occupying tenants (usually tenants who's families have grown-up) to downsize to ground floor properties will provide tenants who may have mobility needs or health issues to move to more manageable and suitable accommodation better suited to their housing needs.

**Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.**

This proposal will have a positive impact on residents regardless of any protected characteristic which they identify with. This proposal will benefit tenants irrespective of their ethnic identity who have been recommended a flat by health advisors on medical ground.

**Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)**

Domestic Abuse can affect anyone regardless of any protected characteristic although there is evidence that it is reported far more commonly among women and children. The proposed reduction in the residential condition from six months to three months for victims of domestic abuse will benefit all applicants on the Common Housing Register.

**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).

**Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.**

Irrespective of gender, it is thought that this proposal will have a positive impact on all applicants who have been placed by the Council in out of Borough private rented sector accommodation.

This proposed change to the Allocations Scheme will apply to those applicants and their households and who have been placed out of the borough into PRS accommodation where they had either become homeless or were at risk of becoming homeless, and the homelessness was prevented with assistance from the Council. This provides applicants accommodated under those circumstances into the PRS security for three years as they will not be removed from the Common Housing Register during this time

Allowing three-years to remain on the Common Housing Register gives these applicants an opportunity to either be offered a suitable property back in Tower Hamlets, or to have acquired eligibility, having lived in their new borough for long enough, to join the housing register and bid for a property in their new borough.

**Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.**

This proposal will benefit all existing social housing tenants regardless of their gender and will have a positive effect. By rehousing social housing tenants who are under-occupying their homes to homes on the ground floor, it is hoped that this will incentivise tenants to look to down-size their homes – potentially providing more movement of larger-sized family homes with the Borough's social housing stock enabling the Council to allocate more larger-sized homes to families in housing need on the Common Housing Register

**Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.**

This proposal will benefit tenants irrespective of their gender who have been recommended a flat by health advisors on medical grounds. This proposal makes no distinction between applicants of either sex, the Allocations Scheme only considers gender in terms of the make-up of an applicant's household in terms of bedroom allocation, and the general monitoring of applicants.

**Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)**

The Council does recognise that while domestic abuse is not restricted to a specific gender, race, religion or class, the vast majority of reported victims of domestic abuse are women and children, and women are also considerably more likely to experience repeated and severe forms of violence, and sexual abuse. Women may experience domestic abuse regardless of ethnicity, religion, class, age, sexuality, disability or lifestyle.

This proposal will have a positive effect on all victims of domestic abuse regardless of their gender. The Council will seek to ensure that its services and those of its partners, are able to meet individuals' needs with a consistent approach in line with good practice and relevant legislation.

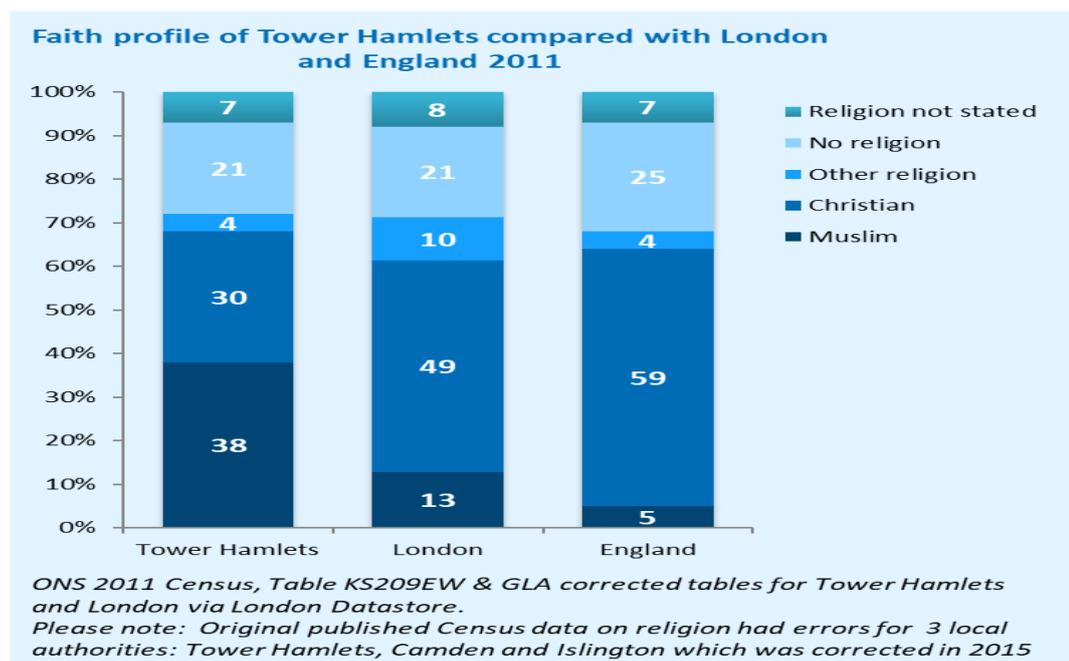
**4) Gender Reassignment (Gender Identity): No information is held on gender reassignment.**

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.

The information currently held on both existing social housing tenants and applicants on the Common Housing Register is insufficient due to a deficit on the data held on those who identify with this protected characteristic. The Council recognises that residents can be reluctant to disclose this information and that this is an elective process on their part. The Council will respect the confidence given to our officers when an applicant chooses to disclose this information to us.

**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.



**Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.**

This proposed change is not anticipated to have any implications or disproportionate impact on any religious groups or faith. This proposal will benefit all applicants who have been placed by the Council in out of borough PRS accommodation because they had either become homeless or were at risk of becoming homeless, and homelessness was prevented with assistance from the Council.

It will provide some reassurance that they can remain on our Common Housing Register while establishing new roots in the borough where they have been placed.

**Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.**

Regardless of an applicant's religion or faith, it is thought that this proposal will have a positive impact on all social tenants and applicants on the Common Housing Register – through the allocation of ground floor flats to those residents who are under-occupying larger family sized homes. This will free up much needed stock and residents are allocated homes based on their housing needs and circumstances and not based on a particular characteristic.

**Proposal 3: Officers to be given authority to prioritise applicants recommended a flat by health advisors on medical grounds.**

This proposal will have a positive effective on all applicants who have a medical need or condition and is irrespective of any other protected characteristic which an applicant and their household might identify with.

**Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)**

Domestic Abuse can affect anyone regardless of any protected characteristic although there is evidence that it is reported far more commonly among women and children. The proposed reduction in the residential condition for victims of domestic abuse will benefit all applicants irrespective of any protected characteristics that they may identify with on the Common Housing Register who are housed in refuge accommodation and will expedite their move into settled accommodation while freeing up much sought after refuge space.

## **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.

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.

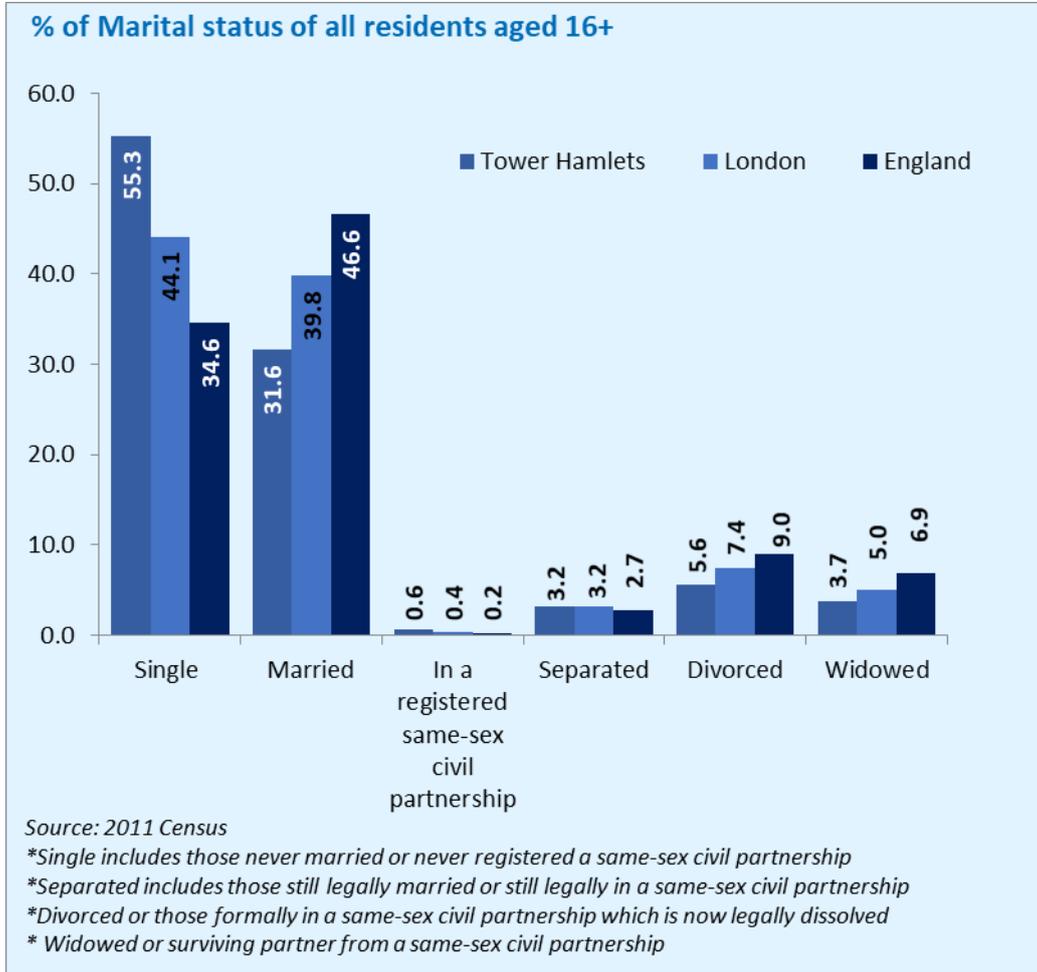
Any issues brought to our attention will be dealt with sensitively on a case by case basis. We recognise that this is an elective process on the part of the tenant and the Council respects the confidence given to our officers when a tenant discloses this information to use.

It is not thought that any of the proposed changes to the Allocations scheme will have disproportionate or negative impact on existing social housing tenants or on applicants applying to join the Common Housing Register. The proposed changes will enable the Council to focus its resources within the social housing stock and applicants will be prioritised according to housing need and on the circumstances of individuals and households accordingly.

## 7) Marital Status

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 existing social housing 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.

The marital status of existing social housing tenants and applicants on the Common Housing Register does not impact on an applicant or their household's eligibility to join.

## 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.

**Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.**

This proposed change is not anticipated to have any implications or a disproportionate impact on any applicants or existing social housing tenants who identify as disabled. This proposal will benefit all applicants who have been placed by the Council in out of borough PRS accommodation because they had either become homeless or were at risk of becoming homeless, and homelessness was prevented with assistance from the Council.

It will provide some reassurance that they can remain on our Common Housing Register while establishing new roots in the Borough where they have been placed.

**Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.**

This proposal will benefit all existing social housing tenants regardless of any protected characteristic that they may identify with however those existing social housing tenants who identify as having a physical disability and who are currently under-occupying a property in excess of their current housing needs will be incentivised to move into ground floor homes which will better suit their mobility needs; having a positive impact on their health and well-being, By rehousing social housing tenants who are under-occupying their homes to homes on the ground floor, it is hoped that this will incentivise tenants to look to down-size their homes – potentially providing more movement of larger-sized family homes with the Borough's social housing stock.

**Proposal 3: Officers to be given authority to prioritise applicants recommended a ground flat by health advisors on medical grounds.**

This proposal will have a positive effect on applicants who have a medical need to be housed in a flat and ensure that those who have mobility issues or a medical condition that requires a specific type of accommodation are allocated a home suitable to their housing needs irrespective of any other protected characteristic that they identify with.

**Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)**

This will benefit all applicants on the Common Housing Register regardless of any protected characteristics which they may identify with as the reduction in the residential criteria for victims of domestic abuse from six to three months will expedite the move from refuge to settled accommodation for all applicants who are in fear of or victims of domestic abuse

**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.

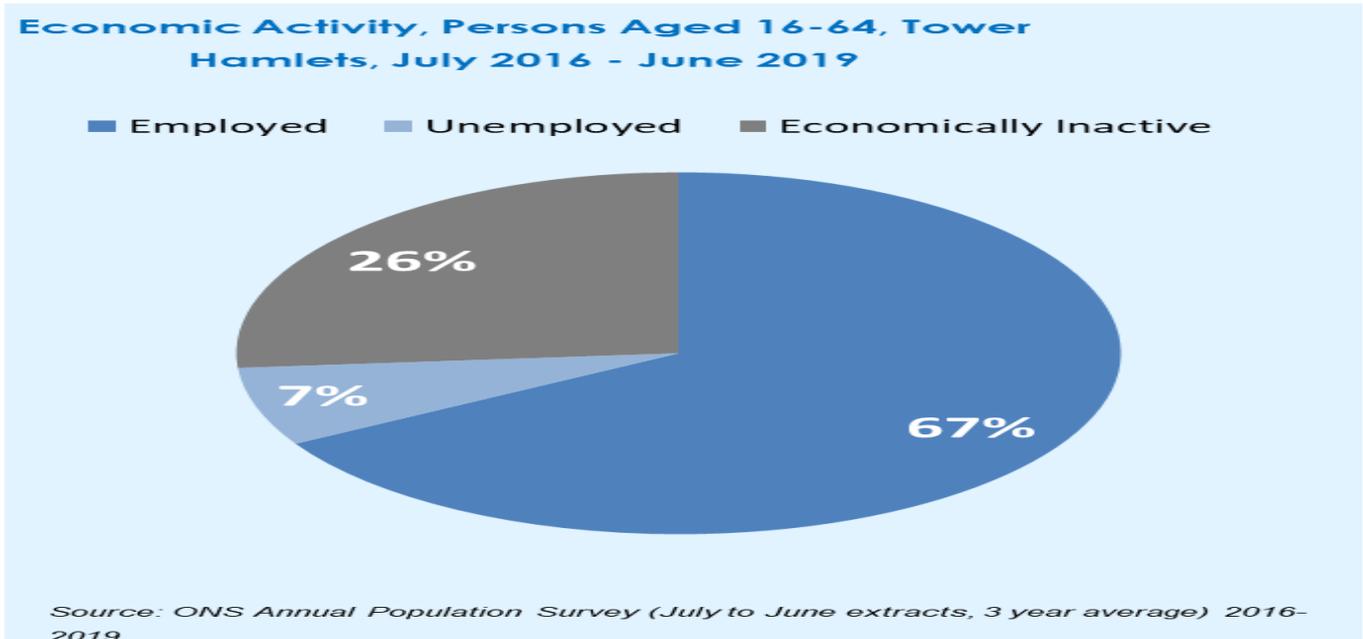
**10) Socio-economic**

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)



**Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.**

This proposal will allow applicants regardless of any protected characteristics that they may identify with the security of knowing that they can remain on the Common Housing Register for three years while they settle into their new local area. This will provide reassurance to those placed in out of borough accommodation and help to assuage any anxiety or concern that if for whatever reason the applicant cannot settle in the Borough, there is the potential for the applicant to remain on the Common Housing Register for three years.

**Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.**

Working age social housing tenants who receive housing benefit and who are under-occupying their home can be subject to the spare room subsidy (bedroom tax). Dependent on the number of bedrooms which a tenant has 'spare' (above their housing needs) tenants, the eligible rent will be reduced by either 14% for one spare bedroom or 25% for two or more spare bedrooms. While there are certain instances where a social housing tenant will be exempt from this restriction to their housing benefit, tenants are expected to make-up the short fall between their entitlement to housing benefit and their rental liability where the spare room subsidy has been placed.

Existing working age social housing tenants who are under-occupying larger family sized homes may be encouraged to downsize to a ground floor home in order to mitigate the financial impact of the spare room subsidy and may find that aside from paying a smaller rental liability than before, their gas, electric and other utility bills may reduce. Similarly, while pension age social housing tenants are not affected by the spare bedroom subsidy, highlighting both the financial benefits of reduced utility bills and the health and well-being aspects of moving to a ground floor flat may encourage residents who are over-accommodated to relinquish a much needed family-sized home.

**Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.**

Under the current Allocations Scheme (2016) lettings officers must make their allocation decision based only on whether an applicant has higher or lower priority in their band when they match on the shortlist.

This proposal would allow officers to also consider medical factors like whether an applicant can manage internal stairs and give preference accordingly.

By allowing officers the discretion to take a balanced approach this will ensure clients requiring ground floor properties on medical grounds (in short supply) are prioritised taking their medical and other circumstances into account.

**Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)**

Reducing the residential condition from six months to three months for victims of domestic abuse will enable the Council to provide a more settled option more expediently as the next move from refuge accommodation to social housing. This will minimise the additional disruptive and distressing moves for individuals and families fleeing abusive situations.

The Government strongly encourages all local authorities to exempt from their residency requirements those who are living in a refuge or other form of safe temporary accommodation in their district having escaped domestic abuse in another local authority area. This is in line with the advice in the statutory Homelessness Code of Guidance which recognises that victims of abuse and their children may need to travel to different areas in order for them to be safe from the perpetrator, and advises local authorities to extend the same level of support to those from other areas as they do to their own residents.

Those who are recovering from the impact of domestic violence and abuse are likely to have medical and welfare needs, including physical and mental health issues, which may be complex and long-lasting. This is the case not only for those who have suffered abuse directly, but other household members indirectly affected, particularly children.

Reducing the residential condition from six months to three months may also reduce the incentive for victims of abuse to seek homelessness assistance and thereby reduce the pressure on the Council's homelessness service provided by the Housing Options Team. It may also free up the spaces available within the Borough's refuge provision.

Target Groups	Impact – Positive or Adverse	Reason(s)
Race	Positive	<p><b>Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b>  <i>This proposal will benefit homeless applicants of all ethnic backgrounds who are placed in PRS accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that they may be able to come back to the borough within three years provided they meet the qualifying criterion.</i></p>
	Positive	<p><b>Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b>  <i>There is a deficit in the supply of larger/family size homes in the Borough. This will benefit applicants who are overcrowded and in real need of larger accommodation as this may increase the number of larger size properties. This has no disproportionate impact on any of the ethnic groups.</i></p>
	Positive	<p><b>Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.</b>  <i>This will have no disproportionate impact on residents of any ethnicity. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat.</i></p>
	Positive	<p><b>Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)</b>  <i>This proposal will benefit applicants of all age groups who are fleeing domestic abuse. Reducing the six-months residency criterion to three months for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the ‘move on’ quota after three months instead of the current six months. In doing so this proposal aims to free-up much needed refuge accommodation for other victims of domestic abuse, regardless of their ethnicity.</i></p>

Disability	Positive	<p><b><u>Proposal 1:</u> Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b></p> <p><i>This proposal will benefit homeless applicants who are placed in PRS accommodation. A suitability assessment is carried out for all homeless applicants and would consider the applicant's disability, and this may give the applicant better living conditions rather than placing them in temporary accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that they may be able to come back to the borough within three years provided they meet the qualifying criterion.</i></p>
	Positive	<p><b><u>Proposal 2:</u> Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b></p> <p><i>This will have no disproportionate impact on residents and may give an applicant the opportunity to be moved to a ground floor flat which may be more beneficial depending on their disability.</i></p>
	Positive	<p><b><u>Proposal 3:</u> Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.</b></p> <p><i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This also reduced the risk of harm to residents or members of their households who have mobility issues.</i></p>
	Positive	<p><b><u>Proposal 4:</u> Reduce the residential condition for victims of domestic abuse (DA)</b></p> <p><i>This proposal will benefit applicants who are fleeing domestic abuse. A suitability assessment would be undertaken, particularly if the applicant or a member of their immediate household has a disability. Reducing the six-month residency criterion to two months for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the 'move on' quota after three months instead of the current six months will free-up much needed refuge accommodation for other victims of domestic abuse.</i></p>

Gender	Positive	<p><b>Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b>  <i>This proposal will benefit homeless applicants regardless of their gender who are placed in PRS accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that they may be able to come back to the borough within three years provided they meet the qualifying criterion.</i></p>
	Positive	<p><b>Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b>  <i>There is a deficit in the supply of larger/family size homes in the borough and a number of tenants who are under-occupying these homes. This will benefit applicants on the housing register who may be overcrowded and in real need of larger accommodation. It has no disproportionate impact on applicants and not based on gender.</i></p>
	Positive	<p><b>Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.</b>  <i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This also reduces the risk of harm to residents or members of their households who have mobility issues, across all genders.</i></p>
	Positive	<p><b>Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)</b>  <i>This proposal will benefit applicants of irrespective of their gender who are fleeing domestic abuse. Reducing the six-month residency criterion to three months for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the ‘move on’ quota after three months instead of the current six months will free-up much needed refuge accommodation for other victims of domestic abuse, regardless of their gender.</i></p>

<p style="text-align: center;"><b>Gender Reassignment</b></p>	<p><b>Positive</b></p>	<p><b><u>Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</u></b>  <i>This proposal will benefit homeless applicants regardless of their gender who are placed in PRS accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that they may be able to come back to the borough within three years provided they meet the qualifying criterion.</i></p>
	<p><b>Positive</b></p>	<p><b><u>Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</u></b>  <i>There is a deficit in the supply of larger/family size homes in the borough and a number of tenants who are under-occupying these homes. This will benefit applicants on the housing register who may be overcrowded and in real need of larger accommodation. It has no disproportionate impact on applicants and not based on gender reassignment unless this creates an issue with overcrowding.</i></p>
	<p><b>Positive</b></p>	<p><b><u>Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.</u></b>  <i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This also reduces the risk of harm to residents or members of their households who have mobility issues and gender is not a determining factor.</i></p>
	<p><b>Positive</b></p>	<p><b><u>Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)</u></b>  <i>This proposal will benefit applicants of irrespective of gender or reassignment who are fleeing domestic abuse. Removing residency criterion for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the ‘move on’ quota after three months instead of the current six months will free-up much needed refuge accommodation for other victims of domestic abuse. If they elect for gender reassignment they would be placed in appropriate accommodation.</i></p>

<p><b>Sexual Orientation</b></p>	<p><b>Positive</b></p>	<p><b><u>Proposal 1:</u> Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b>  <i>This proposal will benefit homeless applicants regardless of their sexual orientation who are placed in PRS accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that they may be able to come back to the borough within three years provided they meet the qualifying criterion.</i></p>
	<p><b>Positive</b></p>	<p><b><u>Proposal 2:</u> Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b>  <i>There is a deficit in the supply of larger/family size homes in the borough and a number of tenants who are under-occupying these homes. This will benefit applicants on the housing register who may be overcrowded and in real need of larger accommodation. It has no disproportionate impact on applicants and will have been brought forward to improve supply of accommodation to those in genuine housing need for larger sized homes.</i></p>
	<p><b>Positive</b></p>	<p><b><u>Proposal 3:</u> Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.</b>  <i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This also reduces the risk of harm to residents or members of their households who have mobility issues and gender is not a determining factor.</i></p>
	<p><b>Positive</b></p>	<p><b><u>Proposal 4:</u> Reduce the residential condition for victims of domestic abuse (DA)</b>  <i>This proposal will benefit applicants of irrespective of sexual orientation who are fleeing domestic abuse. Removing residency criterion for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the ‘move on’ quota after three months instead of the current six months will free-up much needed refuge accommodation for other victims of domestic abuse. If they elect for gender reassignment they would be placed in appropriate accommodation.</i></p>

Religion or Belief	Positive	<p><b>Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b>  <i>This proposal will benefit homeless applicants regardless of their gender who are placed in PRS accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that they may be able to come back to the borough within three years provided they meet the qualifying criterion.</i></p>
	Positive	<p><b>Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b>  <i>There is a deficit in the supply of larger/family size homes in the borough and a number of tenants who are under-occupying these homes. This will benefit applicants on the housing register who may be overcrowded and in real need of larger accommodation. It has no disproportionate impact on applicants and the prioritising of applicants to move to ground floor flats will be based on the housing needs and circumstances of the tenant and not based on their religion or faith.</i></p>
	Positive	<p><b>Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.</b>  <i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This also reduces the risk of harm to residents or members of their households who have mobility issues and religion or belief is not a determining factor.</i></p>
	Positive	<p><b>Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)</b>  <i>This proposal will benefit applicants of irrespective of their religion or belief who are fleeing domestic abuse. Removing residency criterion for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the ‘move on’ quota after three months instead of the current six months will free-up much needed refuge accommodation for other victims of domestic abuse.</i></p>

Age	Positive	<p><b>Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b>  <i>This proposal will benefit homeless applicants of all ages who are placed in PRS accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that if they come back to the Borough within three years provided, they meet the qualifying criterion.</i></p>
	Positive	<p><b>Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b>  <i>There is a deficit in the supply of larger/family size homes in the Borough and a number of tenants who are under-occupying these homes. This will benefit applicants on the housing register of working age who may be overcrowded and in real need of larger accommodation. Working age tenants in receipt of housing benefit who may be under-occupying their home may be subject to the spare room subsidy and losing a percentage of their eligible rent. These residents may be financially impacted and having to find the short fall between their entitlement to housing benefit and their rental liability. While pension age residents are not subject to the spare room subsidy, they may benefit from moving to smaller ground floor accommodation to maintain their independence. They may find that their utility bills are reduced because of downsizing.</i></p>
	Positive	<p><b>Proposal 3: Officers to be given authority to prioritise applicants recommended a flat by health advisors on medical grounds.</b>  <i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This also reduces the risk of harm to residents or members of their households who have mobility issues, across all age ranges.</i></p>
	Positive	<p><b>Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)</b>  <i>This proposal will benefit applicants of all age groups who are fleeing domestic abuse. Removing the three-year residency criterion for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the 'move on' quota after three months instead of the current six months will free-up much needed refuge accommodation for other victims of domestic abuse, regardless of their age.</i></p>

<b>Marriage and Civil Partnerships.</b>	<b>Positive</b>	<p><b><u>Proposal 1:</u> Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b></p> <p><i>This proposal will benefit homeless applicants regardless of their marital status who are placed in PRS accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that they can come back to the borough within three years provided they meet the qualifying criterion.</i></p>
	<b>Positive</b>	<p><b><u>Proposal 2:</u> Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b></p> <p><i>There is a deficit in the supply of larger/family size homes in the borough and a number of tenants who are under-occupying these homes. This proposal will benefit applicants with a larger household who may be overcrowded and in real need of larger accommodation and marital status will have no disproportionate impact on applicants.</i></p>
	<b>Positive</b>	<p><b><u>Proposal 3:</u> Officers to be given authority to prioritise applicants recommended a flat by health advisors on medical grounds.</b></p> <p><i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This also reduces the risk of harm to residents or members of their households who have mobility issues.</i></p>
	<b>Positive</b>	<p><b><u>Proposal 4:</u> Reduce the residential condition for victims of domestic abuse (DA)</b></p> <p><i>This proposal will only benefit applicants of who are fleeing domestic abuse. Removing the three-year residency criterion for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The marital status of the applicant is not relevant in the circumstances of an applicant fleeing domestic abuse.</i></p>

<b>Pregnancy and Maternity</b>	<b>Positive</b>	<p><b><u>Proposal 1:</u> Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b></p> <p><i>This proposal will benefit homeless applicants and particularly households where the applicant or their partner is pregnant as they may be able to source more suitable accommodation rather than temporary accommodation and allow the mother and child an opportunity to build their lives in a more secure environment. An affordability assessment is done for all applicants so if the applicant cannot afford PRS they will not be offered this an option so will have no disproportionate impact. However, if the applicant is pregnant and cannot afford PRS she will still be considered as a family and will not remain in B&amp;B for longer than 6 weeks.</i></p>
	<b>Positive</b>	<p><b><u>Proposal 2:</u> Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b></p> <p><i>There is a deficit in the supply of larger/family size homes in the borough and a number of tenants who are under-occupying these homes. This proposal will benefit applicants with a larger household who may be overcrowded and in real need of larger accommodation and pregnancy will have no disproportionate impact on applicants.</i></p>
	<b>Positive</b>	<p><b><u>Proposal 3:</u> Officers to be given authority to prioritise applicants recommended a flat by health advisors on medical grounds.</b></p> <p><i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This will include a single applicant who may be pregnant.</i></p>
	<b>Positive</b>	<p><b><u>Proposal 4:</u> Reduce the residential condition for victims of domestic abuse (DA)</b></p> <p><i>This proposal will only benefit applicants of who are fleeing domestic abuse. Removing the three-year residency criterion for applicants who have been accepted as homeless on this ground will provide victims who may be pregnant and their families (if they have more children) with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the ‘move on’ quota after three months instead of the current six months will free-up much needed refuge accommodation for other victims of domestic abuse.</i></p>

Other Socio-economic	Positive	<p><b>Proposal 1: Out of Borough Private Rented Sector (PRS) offer to prevent homelessness and allow applicants to remain on the housing register for a time-limited period of three years.</b></p> <p><i>This proposal will benefit homeless applicants regardless of their gender who are placed in PRS accommodation. It has no disproportionate impact and may even afford reluctant applicants some reassurance that they may be able to come back to the borough within three years provided they meet the qualifying criterion.</i></p>
	Positive	<p><b>Proposal 2: Release larger size homes by rehousing under-occupying social tenants on the 1st floor and above to ground floor homes.</b></p> <p><i>There is a deficit in the supply of larger/family size homes in the borough and a number of tenants who are under-occupying these homes. This will benefit applicants on the housing register who may be overcrowded and in real need of larger accommodation.</i></p> <p><i>Working age tenants in receipt of housing benefit who may be under-occupying their home may be subject to the spare room subsidy and losing a percentage of their eligible rent. These residents may be financially impacted and having to find the short fall between their entitlement to housing benefit and their rental liability. While pension age residents are not subject to the spare room subsidy, they may benefit from moving to smaller ground floor accommodation to maintain their independence. They may find that their utility bills are reduced because of downsizing.</i></p>
	Positive	<p><b>Proposal 3: Officers to be given authority to prioritise applicants recommended a ground floor flat by health advisors on medical grounds.</b></p> <p><i>This will have no disproportionate impact on residents. It will free-up accommodation and reduce the time wasted in making unsuitable offers to residents who are for example, while may be suitable for a ground floor flat, would not have the mobility to use internal stairs in the flat. This also reduces the risk of harm to residents or members of their households who have mobility issues and gender is not a determining factor.</i></p>
	Positive	<p><b>Proposal 4: Reduce the residential condition for victims of domestic abuse (DA)</b></p> <p><i>This proposal will benefit applicants of irrespective of gender or reassignment who are fleeing domestic abuse. Removing residency criterion for applicants who have been accepted as homeless on this ground will provide victims and their families with the security needed to rebuild their lives.</i></p> <p><i>The intention to prioritise applicants in refuges under the 'move on' quota after three months instead of the current six months will free-up much needed refuge accommodation for other victims of domestic abuse. If they elect for gender reassignment they would be placed in appropriate accommodation.</i></p>

## 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**

## Section 5 – Quality of 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 are data gaps in the data concerning 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?**

Equalities data has been extracted from the Council's Borough profiling – data from a variety of sources including the Office of National Statistics, the GLA Datastore and Census 2011. In addition, data has been taken from the Council's Housing Options Service regarding demand and lettings in the Borough

It is important to remember that there are some information gaps in the information that is available to the Council. This is because the decision to disclose this information is down to individual and personal choice and residents may be reluctant to share this information.

The information held is variable e.g. pregnancy, which means applicants have to update the service for their application to be reviewed, which will be done as part of any change of circumstances process.

**Section 6 - Action Plan - N/A the proposed changes to the Allocations Scheme will not necessitate mitigating action.**

*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
<p><b>Example</b></p> <p>1. Better collection of feedback, consultation and data sources</p> <p>2. Non-discriminatory behaviour</p>	<p>1. Create and use feedback forms. Consult other providers and experts</p> <p>2. Regular awareness at staff meetings. Train staff in specialist courses</p>	<p>1. Forms ready for January 2010 Start consultations Jan 2010</p> <p>2. Raise awareness at one staff meeting a month. At least 2 specialist courses to be run per year for staff.</p>	<p>1.NR &amp; PB</p> <p>2. NR</p>	

## 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.	<b>Suspend – Further Work Required</b>	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.	<b>Further (specialist) advice should be taken</b>	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.	<b>Proceed pending agreement of mitigating action</b>	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.	<b>Proceed with implementation</b>	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 3<sup>rd</sup> March 2020.

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