

Resident impact assessment of Islington housing allocation scheme 2017

1. SOCIAL HOUSING IN ISLINGTON

Many people are unable to secure appropriate accommodation without support.

This is a major issue in Central London, where property prices and poverty levels are high. Ensuring people can access decent, suitable housing is a key priority for Islington Council. The Council also has a legal obligation to ensure certain groups are housed.

Social housing is a primary tool for tackling this issue. It provides accommodation to roughly 44% of Islington residents at below market rates. Demand for social housing in Islington far exceeds supply with more than 18,000 applications on the Housing Register and approximately only 1,000 properties to let each year.

In cases where the Council has a legal obligation to house someone but is unable to do so immediately it will use temporary accommodation. Temporary accommodation is costly for the council, and represents greater instability for the housed family or individual.

The Council allocates social housing in accordance with its Housing Allocation Scheme. The scheme is developed in accordance with legislation and Government guidance.

This document outlines Islington's housing allocations policy and identifies which elements are nationally determined, which are local priorities and which have been added as part of the 2017 revision of the policy. This document also provides a brief summary of Islington's housing stock.

2. HOUSING ALLOCATION IN ISLINGTON

2.1 Guiding Principles

The Council's Housing Allocation Scheme lists the following guiding principles:

- it must comply with statutory rules set out under legislation and accompanying regulations and take into account Codes of Guidance issued by central government from time to time
- the cost of temporary accommodation is reduced by ensuring homelessness is prevented and homeless people and people who are threatened with homelessness are rehoused as soon as practicably possible
- applicants considered to be extremely high priority should be assessed accordingly so that the priority is reflected in their position on the register
- the scheme must complement the council's other responsibilities, for example meeting social care needs and minimising financial risk to the council.
- it must be simple and fair, so that it is easy for local people to understand, allows vacant properties to be filled quickly, and ensures equal opportunities for all sections of the community
- it should anticipate the majority of housing problems so that the need for individual discretionary decisions is minimised
- procedures for reviewing decisions on priority or the suitability of offers need to be open and accountable

- the most serious insanitary or overcrowded housing in the borough must be addressed.

2. 2 Choice Based Lettings and Preference

The Council is legally obliged to prioritise certain groups when allocating social housing. The Council also chooses to give additional assistance to other groups based on local priorities.

All applicants for social housing in Islington are placed on the Housing Register. Choice Based Lettings is the most common way that people on the Housing Register are allocated housing in Islington. Under this system, applicants are allocated points which they can then use to bid for properties when they become available. Priority groups are given preference under the system by being awarded additional points. Properties are awarded to the application with the most points. The system is designed to recognise people's level of need while giving them as much choice as possible.

The revised scheme sets out the principle that the Housing Department can choose to select applicants to go through a process of Supported choice. Under this process applicants can be offered up to two properties. If they decline both then they are liable to have points deducted or, in the case of homeless applicants, be removed from the Housing Register. The intention of using this approach is to give the authority the ability to increase offers to homeless households living in temporary accommodation where necessary. There is ample evidence that households living in temporary accommodation for long periods suffer additional health problems and children living in temporary accommodation can experience disrupted schooling leading to poor educational attainment which can have detrimental effects lasting into adulthood. As well as being socially damaging temporary accommodation is expensive for the authority to provide leading to reduced funds for other essential services.

2.2.1 Priority Groups

This section identifies groups who are prioritised under the Choice Based Lettings system. Applicants will receive a points awards for each of the categories that applies to them.

Islington Council is legally required to prioritise the following groups in the allocation of social housing under the 1996 Housing Act 1996

- **Homeless:** Those defined as homeless or at risk of homelessness
- **Overcrowded:** Those living in overcrowded or unsanitary conditions
- **Armed Forces:** Current or previous serving members of the armed forces
- **Disabled:** Those who need to move for medical reasons (including any grounds relating to disability).
- **Welfare grounds:** Those who need housing on welfare grounds including, but not limited to, people leaving care, people completing drug and alcohol programmes, people with a learning disability

Based on local priorities the following groups are already prioritised under Islington's existing scheme:

- **Sons and daughters of Islington residents-** The New Generation Scheme awards housing points to the sons and daughters of council, housing association and private tenants living continuously in the borough as an agreed member of the household of an Islington resident for at least three out of the last five years. The scheme is

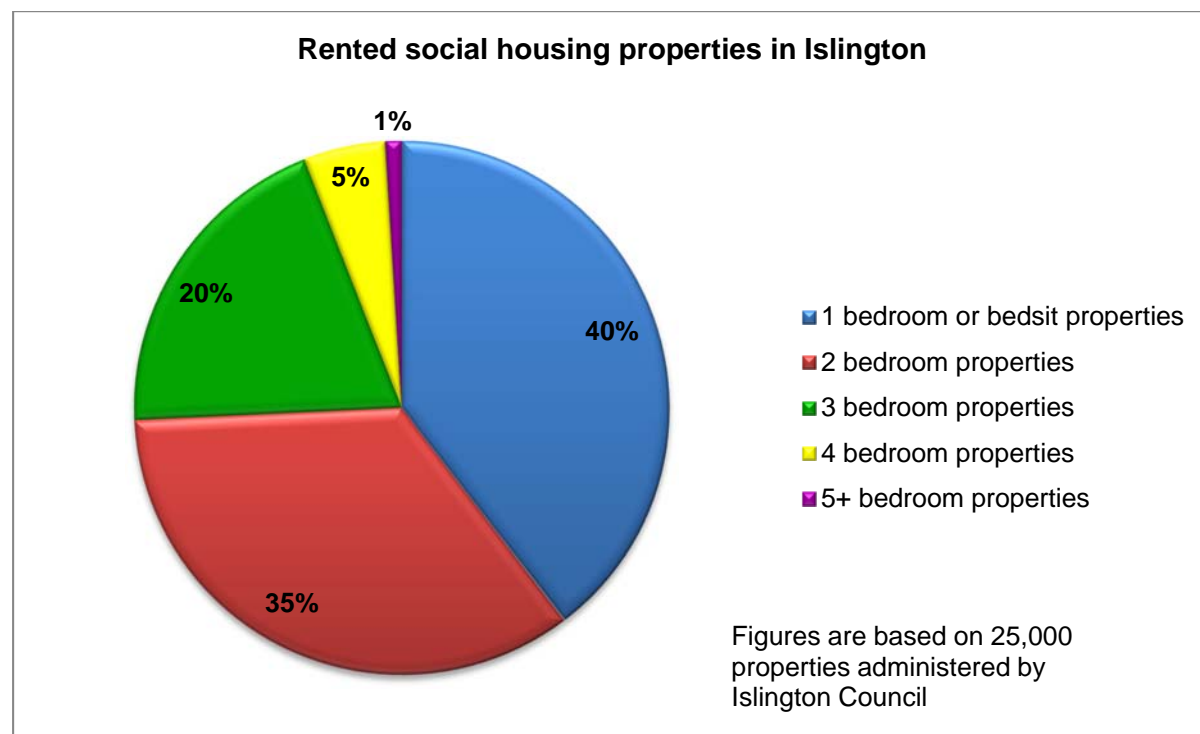
designed to promote stronger communities by helping children to live in the same area as their parents. This is expected to improve the health and well-being of affected residents.

- **Tenants who under occupy their home:** Tenants who are under occupying are given additional points to bid for smaller properties. This is designed to help free up larger properties for families.
- **Tenants whose homes are scheduled for major works:** Tenants in properties scheduled for major works will be given additional points to access alternative housing. These tenants will normally be required to return to the original property after the works are completed.

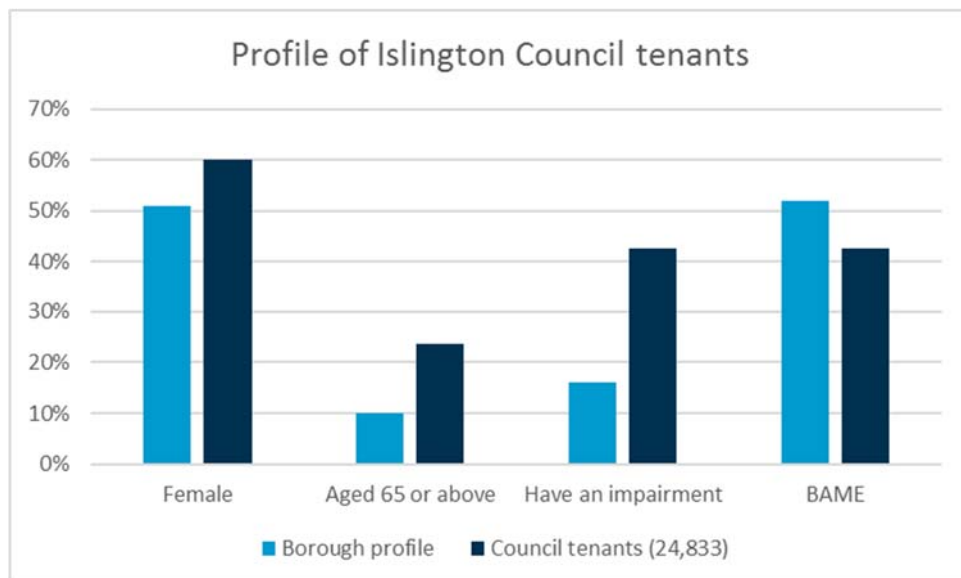
3. SOCIAL HOUSING IN ISLINGTON BREAKDOWN

As noted above, Islington's housing allocation policy is designed to prioritise certain groups. This section provides a brief summary of Islington social housing stock and who lives in it. The section also provides a breakdown of the Housing Register and recent allocations. Islington Council administers roughly 25,000 rented social housing properties in Islington. Of these roughly:

- 40% are 1 bedroom or bedsit properties
- 35% are 2 bedroom properties
- 20% are 3 bedroom properties
- 5% are 4 bedroom properties
- 1% are 5+ bedroom properties

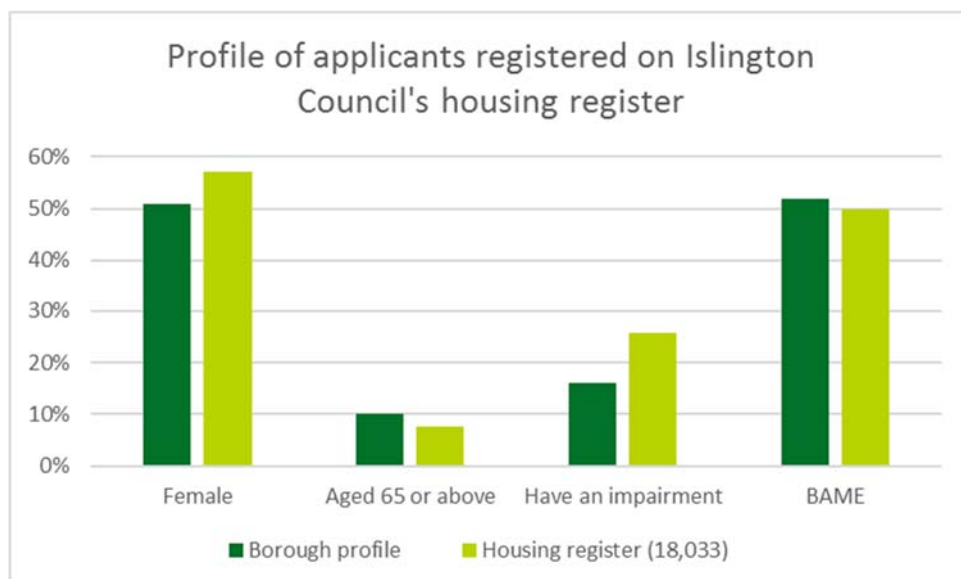


Of the **tenants** living in these properties:
 42.6% are estimated to be BAME
 42.5% have defined themselves as having an impairment
 60% of households are headed by a woman
 23.7% are over 65



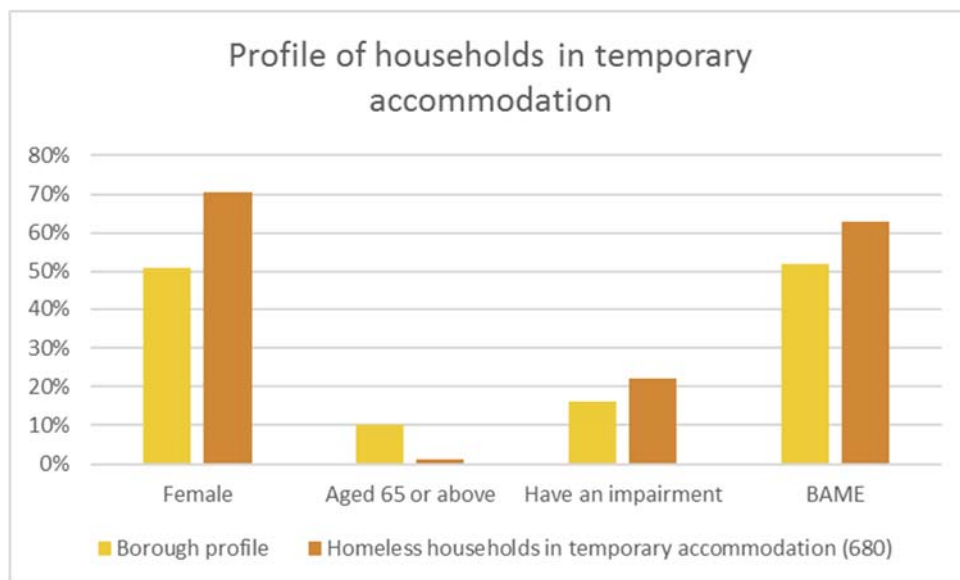
Of 18,033 **applicants** on Islington's Housing Register:

- 50 % are estimated to be BAME
- 25.7 % who have declared their disability status have registered an impairment
- 57 % are registered as female
- 7.6 % are registered as aged over 65



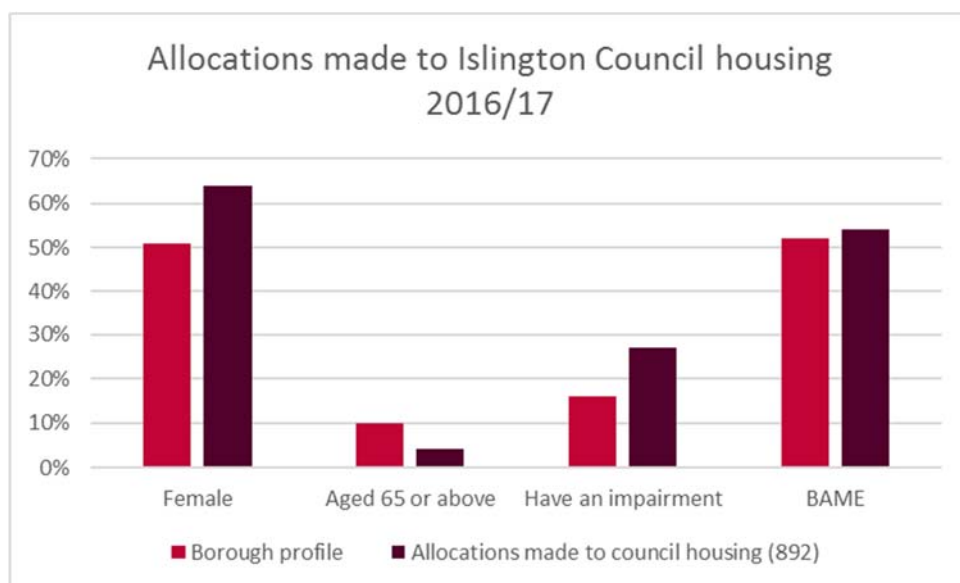
Of the **homeless** households in temporary accommodation

- 63% are estimated to be BAME
- 70.5% are registered as female
- 22% who have declared their disability status have registered an impairment
- 1% are registered as aged over 65



In 2016/17 Islington let 861 properties (this does not include properties let by social landlords). Of these properties an estimated:

- 54 % went to applicants registered as BAME
- 64% went to female applicants
- 4% went to applicants aged over 65
- 27% went to applicants with a declared disability



Allocations made in the last 5 years

| | Homeless households | Transfers from social housing tenancies | Other housing applicants |
|---------|---------------------|---|--------------------------|
| 2011/12 | 19% | 36% | 45% |
| 2012/13 | 16% | 40% | 43% |
| 2013/14 | 21% | 41% | 39% |
| 2014/15 | 30% | 34% | 36% |
| 2015/16 | 29% | 36% | 36% |
| 2016/17 | 32% | 40% | 36% |

3. CONCLUSION

Although Islington Council is responsible for administering the allocation of housing, it is constrained in choosing who is allocated housing by a number of factors. These include:

- **Limited supply:** Although Islington administers more than 25,000 properties, fewer than 1,000 become available to let each year.
- **Type of property:** People can only be allocated a property where it is suitable for their needs. Almost half of all properties let annually are 1 bedroom which are unsuitable for families.
- **National Legislation:** Islington is bound by nationally determined legislation which requires certain groups (such as the overcrowded) be prioritised and other groups (such as asylum seekers) are excluded from social housing.
- **High demand:** There are more than 18,000 applications currently on the Housing Register. The majority of these applications are made by people experiencing one form of housing need such as overcrowding, insanitary conditions or homelessness. Many of these applicants also have children.

Islington Council manages allocation in the context of these limitations and aims to provide a system of allocation that is fair and addresses the high levels of need experienced by many residents.

Summary of main equalities impacts of the amendments to the Housing Allocations Scheme

Overview

Islington Council has a legal obligation to pay due regard to the Public Sector Equality Duty (PSED) in the manner in which it carries out its functions. The three elements of the PSED are:

1. Eliminate unlawful discrimination harassment, victimisation and any other conduct prohibited by the Act;
2. Advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
3. Foster good relations between people who share a protected characteristic and people who do not share it.

The function under scrutiny here is Islington Council's allocation of social housing. The protected characteristics which need to be considered are age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief and sexual orientation. The duty to have due regard to the need to eliminate discrimination also covers marriage and civil partnerships.

Paying due regard requires a proper assessment of likely impacts based on available data. Due regard also requires the thorough consideration of alternative courses of action that could avoid or mitigate any potential negative impact of the policy. Due regard should therefore facilitate an informed decision about the respective costs and benefits of sticking with a policy or altering it.

In the context of the housing allocations we need to show that we have made careful decisions about who to prioritise for housing and that we are aware of the implications of those decisions on other groups.

Against each duty we shall look at:

- What each element of the PSED means and how it is relevant to housing allocation
- An overview of the current equalities considerations in housing allocation in relation to that element of the duty
- Potential equalities concerns about the revised Housing Allocation Scheme (HAS) in relation to this duty
- Possible alternative measures to avoid or mitigate concerns

Summary of findings

The HAS states Islington Council's commitment to providing a fair, open and accountable system for allocating housing that is easy for residents to understand. The scheme also states a commitment to tackling the most serious insanitary or overcrowded housing in the borough.

There are no major equalities risks identified in the revised HAS with respect to the 1st element of the duty.

There is some risk related to the 2nd and 3rd elements of the duty in that, without effective communication with residents, the revised HAS could be interpreted as an endorsing inaccurate and negative perceptions of certain groups.

Public Sector Equality Duty 1: Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.

The Duty

This element of the PSED means people should not be discriminated against on the grounds of their possession of a protected characteristic.

Current equality considerations

The HAS does not explicitly discriminate against any of the equality groups – there is no protected characteristic group that is singled out and directly prohibited from accessing housing. However, it should be noted that applicants aged over 65 and applicants who stated their sexuality as lesbian, gay or bisexual are under represented among those who received a housing allocation compared to the profile of the housing register.

Equality risk of proposed changes

The introduction of the additional points criteria may mean that homeless households in temporary accommodation receive a greater proportion of housing allocations. This group tend to be younger than the housing register profile.

Alternatives to consider

Older applicants may require assistance in using the choice based lettings scheme and may find moving home more difficult than younger people. The council could consider allocating additional resource to help this group secure housing.

More research needs to be carried out to look at why LGBT applicants are less successful in securing accommodation.

Public Sector Equality Duty 2: Advance equality of opportunity between people who share a protected characteristic and those who do not.

The Duty

This element of the PSED is designed to promote equality of opportunity and promote equal outcomes between people of different groups.

In the context of housing allocations this means that people's chance of securing housing should be primarily dependent on their level of need, and should not be affected by their possession of a protected characteristic, unless that characteristic determines need as in the case of disability.

Current equality considerations

There are no major equalities concerns about current housing allocations in Islington. Detailed analysis shows that women, BME groups, disabled people and the elderly are disproportionately represented in social housing in Islington, compared to the population as a whole. Because equalities groups experience a disproportionately high level of need (eg, BME people are more likely to experience deprivation, women are more likely to be lone parents etc) and the housing allocation system awards points on the basis of need, the fact that they are more likely to get housing is to be expected.

Equality of opportunity in housing allocation needs to be considered in the context of high demand and limited supply. This is because increasing access to housing for one group is likely to affect access of other groups. By this rationale, increasing access to housing on factors other than need, is likely to decrease access on the basis of need. In this respect, one concern with the existing scheme is that it awards people 5% of their existing points score for every year on the Housing Register meaning people with lower levels of need may have greater access to housing than those with higher levels of need who have been on the Housing Register for less time.

Potential concerns

- Increased Competition

The addition of a points allocation for homeless households in temporary accommodation may lead to increased competition for properties and may make it harder for disabled applicants to secure housing. The revised scheme will reserve accessible properties for applicants with mobility needs. However, this will not help disabled people without mobility issues (eg visually impaired, mentally disabled etc) who may be disadvantaged by increased demand from homeless households.

Mitigation to consider

Additional resources could be put into assisting those with non-mobility impairments to use the choice based lettings scheme.

Public Sector Equality Duty 3: Foster good relations between people who share a protected characteristic and those who do not.

The Duty

This part of the duty is designed to promote good relations between people who share a protected characteristic and those who do not

The duty has particular relevance because the allocation of social housing is one of the most politically sensitive subjects in relation to immigration and has been a regular subject in the media; there is a continued perception that migrants displace British social housing applicants.

Current situation

There are no major equalities concerns about current housing allocations in Islington. However, the complex nature of the HAS and a lack of communication could make it appear arbitrary and unfair to residents.

Potential Concerns

The addition of a points allocation for homeless households in temporary accommodation may lead to increased competition for properties and have a negative impact on relations between people who share a protected characteristic and those who do not.

Mitigation to consider

The consultation with residents regarding the changes to the HAS should address the potential concerns.

The Council could do more work to develop positive and meaningful interaction between immigrant groups and local communities to reduce negative stereotypes. These could be focused on individual estates and try to ensure new tenants are rapidly integrated into the local community. Communications could also be used to promote a more balanced picture of the reality of social housing in Islington, highlighting the deprivation social housing is used to address.