

Equality Impact Assessment

The Housing Allocation Scheme 2022

Service Area: Homes and Neighbourhoods

1. What are the intended outcomes of this policy, function etc?

The overall aim of the Scheme is to ensure that social housing is allocated fairly and objectively to those in the greatest housing need.

2. Resident Profile

Who is going to be impacted by this change i.e. residents/service users/tenants?

| | | Borough profile | Housing Register |
|--------------------------|------------------------------|------------------------|-------------------------|
| | | Total: 206,285 | Total: 14,003 |
| Gender | Female | 51% | 58% |
| | Male | 49% | 42% |
| | Other | | 0.1% |
| Age | Under 16 | 16% | 0% |
| | 16-24 | 14% | 13% |
| | 25-44 | 42% | 52% |
| | 45-64 | 19% | 26% |
| | 65+ | 9% | 8% |
| Disability | Disabled | 16% | 24% |
| | Non-disabled | 84% | 76% |
| Sexual orientatio | LGBT | No data | 6% |
| | Heterosexual/straight | No data | 94% |
| Race | BME | 52% | 52% |
| | White | 48% | 48% |

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| Religion or belief | Christian | 40% | 46% |
| | Muslim | 10% | 25% |
| | Other | 4.5% | 5.5% |
| | No religion | 30% | 24% |
| | Religion not stated | 17% | |

3. Equality impacts

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 these issues. 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 14,000 households on the Housing Register and approximately only 1,000 properties to let each year equating to about 7% of households on the Housing Register.

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.

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

- 1) A common housing register which will enable residents in housing need to access social housing across Islington;
- 2) To provide a high quality service to residents;
- 3) Meet the legal obligations of the Council, namely to give appropriate priority to residents who fall within the Housing Act "reasonable preference" categories;
- 4) Help prevent homelessness and offer realistic choice to those with a housing need
- 5) Improve local mobility across the London Borough of Islington;
- 6) To ensure that housing is allocated to those most in need or at risk and to ensure that, as far as possible, resources are targeted at local people;
- 7) To contribute to creating balanced and sustainable communities, promote the council's equality principles and be mindful of the communities we create;
- 8) To ensure that every resident is treated fairly and consistently irrespective of race and ethnicity, disability, gender/gender reassignment, sexual orientation, religion and belief and age;
- 9) A Scheme that is simple to understand, transparent and is seen as fair and accountable by applicants and Islington residents generally;
- 10) 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;
- 11) The housing allocation scheme contributes to ending homelessness and eliminating rough sleeping;

12) The scheme must complement the council's other responsibilities, for example meeting social care needs and minimising financial risk to the council.

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 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.

An Equality Impact Assessment (EQIA) is carried out annually to ensure the Allocation Scheme is not inadvertently discriminating against any of the protected characteristics when compared to the profile of the Housing Register and the profile of the borough's population. The findings of the EQIA carried out at the end of 2020/21 found:

- In general, the profile of Islington's housing applicants and those allocated a new property is slightly younger, comprises more females, and includes more people of colour than the borough's population.
- While these groups are over-represented, relative to the borough's population, they are likely to be a consequence of dependent children contributing to a priority need decision, ethnic inequalities in the labour market and other factors that contribute to homelessness.
- Overall, there is no obvious indication of inequitable processing in the Housing allocations process.

The full report is attached to this report as Appendix 1.

The table below lists the proposed changes to the current Allocation Scheme and the anticipated equalities impact if any.

Proposed changes to the Housing Allocation Scheme

| Current wording | New wording | Expected equalities impact |
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| <p>Applicants who cannot join the housing register – Non-Residence</p> <p>People who are not resident in the borough on the date of application, and people who have lived in Islington for less than three out of the previous five years from the date they apply for housing, cannot join the housing register</p> | <p>Applicants who cannot join the housing register-Non-Residence</p> <p>People who are not resident in the borough on the date of application and have not continuously lived in Islington for at least five years from the date they apply for housing cannot join the housing register</p> | <p>Neutral:</p> <p>This change could adversely impact on people who are more mobile. The disqualification is however mitigated by a considerable number of exceptions. Applications are considered on their individual circumstances and an applicant can request a review on disqualification from the housing register. We will carefully</p> |

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| | | monitor the effect of this change. |
| | <p>Applicants who cannot join the housing register- non residence exception (p17)</p> <ul style="list-style-type: none"> • Moving due to domestic abuse | <p>Positive</p> <p>Women and single female parents are over-represented in this group.</p> |
| <p>Applicants who cannot join the housing register - Unacceptable behaviour Being the perpetrator of violent, coercive, or controlling behaviour towards a resident of the borough</p> | <p>Applicants who cannot join the housing register - Unacceptable behaviour (page 17) wording changed to expand scope Being the perpetrator of domestic abuse, violent, coercive, or controlling behaviour towards a resident of the borough.</p> | <p>Positive</p> |
| <p>Applicants who cannot join the housing register – Households with sufficient income or capital to meet their own housing need</p> | <p>Applicants who cannot join the housing register – Households who have sufficient financial resources to own or rent accommodation (page 18) - item7 wording changed regarding income.</p> <p>a) Applicants who have total savings, investments and/or assets of £ 16,000 or more b) Applicants whose households total gross income from all sources exceeds an annual income of £90,000.</p> | <p>Neutral</p> <p>This proposed change of wording seeks to clarify and define what constitutes sufficient financial resources so that the scheme is more transparent for all housing applicants.</p> |
| <p>Residence Points Applicants must be resident in the borough for at least three out of the last five years from the date of application</p> | <p>Residence Points 100 points are awarded to everyone who has been resident in the borough continuously for the last five years at the date of application</p> | <p>Neutral</p> <p>Maintain points award for people who meet the residence criteria</p> |
| <p>Waiting time points Points are calculated at 5% per year of housing needs</p> | <p>Waiting time points- This section has been removed.</p> | <p>Positive</p> <p>The purpose of this proposed change to the existing Scheme</p> |

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| <p>points (except residence points)</p> | | <p>is to prevent applicants without a significant housing need who have accrued a high level of waiting time points from leapfrogging applicants who are in severe housing need. Therefore, applicants with the same number of points will be prioritised for a letting based on time spent on the housing register.</p> |
| | <p>Dividing households (Page 21) additional wording</p> <p>A council tenant may request one or more separate properties for their authorised household members. The council will only agree to this request where:</p> <ul style="list-style-type: none"> • the tenant and the authorised household members move to one bedroom properties; • the number of one bedroom properties required does not exceed the number of bedrooms in the original larger home; • the tenant and household member to be re-housed simultaneously <p>Shared residency of children Where children are subject to a shared residency arrangement the children are only considered to need one home of adequate size. Where either parent has a home of adequate size the remaining parent will be assessed as having overnight access only and no additional bedrooms will be agreed for the children.</p> <p>Households occupying more than one tenancy Where a family unit is not currently residing together the assessment will be based on the</p> | <p>Neutral</p> <p>This proposed change is to clarify how this sort of request will be dealt with so is added to provide clarity and transparency.</p> <p>It is not expected that this change will have any negative impact to any protected group</p> |

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| | part of the household that occupies accommodation that provides them with the most suitable housing providing there is a reasonable expectation that they should reside together. The residency qualification will be based on that part of the household with the longest residency in the borough. | |
| Medical points Category A 150 | Medical points- (page 22) Cat A 200 points (change to points award) | Positive Applicants who receive medical category A will have a disability or impairment that is severely impacted by their current housing and they would usually require a specific property type. It is expected that the additional points award will assist those with an acute and significant medical need to secure suitable housing more quickly. |
| Welfare points Welfare A Where the accommodation is required to meet the assessed needs of relevant children and other care leavers under the Children Leaving Care Act 2000. Welfare B Where an applicant or a member of their household has to move in order to be near a person to whom they give or receive care and support | Welfare points (page25-26) Welfare A <ul style="list-style-type: none"> • Where the accommodation is required to meet the needs of a child who has been assessed as in severe harm or fatality due to their accommodation as assessed by Children’s Services. • Where there is a risk of a child within the applicant’s household coming into Local Authority care or residential care due to their housing situation • Where a property is declared unfit for habitation or has a category 1 hazard due to damp and mould, as confirmed by the Public Protection team, or Islington Diagnostic Surveyors and which has a severe impact on the household Welfare B <ul style="list-style-type: none"> • Where an applicant or a member of their household has | Neutral: No change to points awarded. Clarification on wording of examples |

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| | <p>to move in order to be near a person to whom they give or receive care and support. The applicant should be in receipt of Attendance Allowance or Personal Independence Payments at the middle or highest rate. The carer should normally be in receipt of carer's allowance or the applicant is receiving a package of care following a social work assessment.</p> <ul style="list-style-type: none"> • Where the accommodation is required to meet the needs of a child who has been assessed as in urgent risk of harm due to their accommodation as assessed by Children's Services. • Where an applicant is experiencing a threat of violence, abuse or harassment that is impacting their living conditions • Where accommodation is required to meet the needs of a child as assessed in a Child in Need (CIN) plan • The applicant is living in such insanitary conditions that their welfare is prejudiced, and there are no remedies available to improve the conditions including where there is damp and mould <p>Welfare C</p> <p>The applicant is living in such conditions that their welfare is prejudiced for example, where there is mould and condensation and limited remedies are available, to resolve the issue.</p> | |
| | <p>Management Transfers (page 27)</p> | <p>Neutral</p> <p>These points were previous awarded under welfare grounds.</p> |

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| | <p>These points are only awarded to council tenants where a move is necessary on management grounds. Points may be awarded as follows: 150 points may be awarded:</p> <ul style="list-style-type: none"> • Where there is evidence to indicate that the tenant is currently at risk of serious harm from a third party perpetrator(s). For example, risk of possible homicide, serious injury, assault or abuse including domestic or sexual violence • where it can be evidenced that the risks can only be managed effectively by moving the tenant elsewhere • where there is a corresponding safety plan in place setting out how the new address will be kept confidential, minimising the risks of the perpetrator (s) finding the victim/survivor | |
| <p>Points awarded from previous Allocation Scheme (Retention Points)</p> <p>Applicants retain these points under previous Allocation schemes (2010 and 2013)</p> | <p>Points awarded from previous Allocation Scheme (Retention Points) (page 28)</p> <p>This section has been removed:</p> <p>Reason: All applications to be re-assess and therefore these points will be no longer applicable</p> | <p>Positive</p> <p>Our analysis has shown this will disproportionately affect older age groups aged over 45. However, those applicants have had time to use points secured under previous schemes in 2010 and 2013 to secure a move. Removing these points will make the Scheme clearer and more transparent for all applicants.</p> |
| <p>Relationship Breakdown</p> <p>Where a relationship has occurred between couples and one or both partners are an Islington council tenant.</p> | <p>Relationship Breakdown</p> <p>This section has been removed:</p> <p>Reason:</p> <ul style="list-style-type: none"> • There is a growing increase in high needs single vulnerable applicants who require housing. This should be | <p>Neutral</p> <p>Analysis shows as expected that males will be affected more than females by this change. Very few applicants were able to secure social housing through this points allocation. Applicants experiencing relationship breakdown will be able to seek advice and assistance to secure a settled</p> |

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| | removed due to the severe shortage of social housing | home as a result of the Homelessness Prevention Act and have a much greater and realistic chance of actually securing an alternative settled home. |
| | <p>Domestic Abuse (page 28)</p> <ul style="list-style-type: none"> Applicants fleeing domestic violence and abuse that have been assessed by MARAC These applicants will be awarded 30 additional priority points | <p>Positive</p> <p>Women and single female parents are over represented in this group.</p> |
| <p>New generation scheme: Applicants must be living continuously as an agreed member of the household of an Islington resident for at least three out of the last five years</p> | <p>New generation scheme (page28) Applicants must have lived continuously as an agreed member of the household of an Islington resident for the five years prior to the date of application</p> | <p>Neutral: It is not expected that this change will have negative impact to any protected group</p> |
| | <p>Prevention of homelessness (page 30)</p> <p>Applicants who were owed under Part VII of the Housing Act 1996 a prevention duty (section 195(2)) or relief duty (section 189B (2)) who have accepted a private sector tenancy solution will be awarded 30 points.</p> <p>Applicants who would normally be offered a section 193 (2) main housing duty and who have accepted a private sector tenancy solution will be awarded 70 points.</p> | <p>Positive</p> <p>Women, single parents, people with a disability or impairment, people from a BAME background and younger people are over represented among those who make homeless applications when compared to the rest of the housing register and the general population.</p> <p>This points allocation will encourage homeless applicants to take up a housing option suitable for their needs and also allow them to remain on Islington's housing register.</p> |
| <p>Applicants not bidding</p> <p>The council will review all applications where no bid has been placed on a regular basis. Applicants will be</p> | <p>Applicants not bidding (Page 36)</p> <p>The council will review all applications where no bid has been placed on a regular basis.</p> | <p>Neutral</p> <p>It is not expected that this proposed change will have a negative impact to any protected group.</p> |

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| <p>contacted to make sure that they understand how to bid and to ensure that they will be able to make future bids.</p> <p>Applicants who persistently bid and do not attend viewings and applicants who consistently accept and later refuse properties may be suspended from the list for 6 months.</p> | <p>Applicants will be contacted to make sure that they understand how to bid and to ensure that they will be able to make future bids.</p> <p>Applicants who:</p> <ul style="list-style-type: none"> • persistently bid and do not attend viewings • applicants who consistently accept and later refuse properties • or applicants who fail to bid for more than twelve months may be removed from the Housing Register. <p>These applicants will be required to reapply if they consider they still have a housing need. Any decision to remove an applicant from the housing register is subject to review</p> | |
| <p>Supported choice</p> <p>Applicants agreed 2 offers of housing</p> | <p>Supported Choice (page 36)</p> <p>Where supported choice lettings are made an applicant will be given access to the choice based lettings system for a minimum of four weeks. If they are not successful within this time they will be made an offer of a suitable property based on their assessed need for accommodation.</p> | <p>Neutral</p> <p>Applicants selected for supported choice because they are unable to use the bidding system effectively will undergo a thorough suitability assessment to ensure that any offer made will meet their requirements. All final offers are subject to the reviews process which will ensure any offers made are suitable.</p> |
| <p>New homes Local Lettings Council Estate:</p> <p>Priority is given to:</p> <p>Secure council tenants Household members of a secure council tenants Secure council tenants requesting a like for like transfer</p> <p>Ward Priority</p> <p>Secure social housing tenants</p> | <p>New Homes Local Lettings (page 40)</p> <p>Council Estate</p> <p>Priority is given to</p> <p>Current secure council tenants who meet the bidding threshold</p> <p>Ward priority</p> <p>Assured/secure social housing tenants living in the ward where the new homes for social rent are built will be given priority when the new homes are let.</p> | <p>Positive</p> <p>The introduction of Lettings Plans for individual schemes will mean that although the overwhelming majority of lettings on new build properties will continue to be let to residents on the estate (or ward), some properties will be available for applicants who need to move area for safety reasons. Women are over represented among this group.</p> |

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| <p>Household members of secure social housing tenants</p> <p>...</p> <p>Other new social housing</p> <p>This will apply to either current social housing tenants or family members living with the tenants for the last 12 months</p> | <p>Other new social housing</p> <p>Applicants must be assured/secure council tenants living in the ward who meet the bidding threshold</p> | |
| <p>Intra Estate Transfer</p> <p>20% of available voids on estates are prioritise to tenants who live on the estate</p> | <p>Intra estate Transfer</p> <p>This section has been removed:</p> <p>Reason:</p> <ul style="list-style-type: none"> • Due to the severe shortage of housing and the increase demand in high needs cases. | <p>Neutral</p> <p>This scheme has been superseded by local lettings policy on new build property.</p> |
| <p>Keyworker housing</p> <p>Islington keyworkers (Social Workers, Teachers, Metropolitan police nurses working in Islington are awarded housing points to bid for a bedsitter or 1 bedroom accommodation on a non-secure let</p> | <p>Keyworker housing</p> <p>This section has been removed:</p> <p>Reason:</p> <ul style="list-style-type: none"> • There is a growing increase in high needs single vulnerable applicants who require housing. This should be removed due to the severe shortage of social housing accommodation. | <p>Neutral</p> <p>It is not expected that this proposed change will have a negative impact on any protected group.</p> <p>This was a scheme to encourage people to take up employment in the borough. There are low cost home ownership and intermediate rent opportunities available which are a more secure type of housing for these applicants.</p> |
| | <p>Supported housing move on new points allocation (page 20)</p> <p>100 points may be awarded to applicants in supported housing where it is in the council's wider strategic interest for these applicants to move on from supported housing Examples where this may occur include:</p> | <p>Positive</p> <p>This will enable the council to make best use of limited supported housing for those who require it</p> |

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| | <ul style="list-style-type: none"> • The applicant is in supported accommodation that they no longer need and that the council urgently requires that accommodation for other applicants • The supported accommodation scheme is closing down or changing use • The applicant has multiple complex needs and has a demonstrable need for settled accommodation in borough which they cannot reasonably be expected to find for themselves in the near future | |
| <p>Armed forces personnel To serving members of the regular forces who are suffering from a serious injury, illness or disability which is wholly or partly attributable to their service</p> | <p>Armed forces personnel (p17) To serving members or former members of the regular forces or reserve forces who are suffering from a serious injury, illness or disability which is wholly or partly attributable to their service</p> | Neutral |
| | | |

4. Safeguarding and Human Rights impacts

a) Safeguarding risks and Human Rights breaches

Please describe any safeguarding risks for children or vulnerable adults AND any potential human rights breaches that may occur as a result of the proposal? Please refer to **section 4.8** of the [guidance](#) for more information.

If potential safeguarding and human rights risks are identified then **please contact equalities@islington.gov.uk to discuss further:**

5. Action

How will you respond to the impacts that you have identified in sections 3 and 4, or address any gaps in data or information?

For more information on identifying actions that will limit the negative impact of the policy for protected groups see the [guidance](#).

| Action | Responsible person or team | Deadline |
|---|----------------------------|----------|
| There is very little consistent recording of disability, and there is relatively little recording of religion, marital status and sexual orientation. There may be value in improving recording of these factors, to further inform future work in this area. | Housing Needs | |
| Do more work to develop positive and meaningful interaction between immigrant groups and local communities to reduce negative stereotypes | VCS team | |
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Please send the completed RIA to equalites@islington.gov.uk and also make it publicly available online along with the relevant policy or service change.

This Equality Impact Assessment has been completed in accordance with the guidance and using appropriate evidence.

Staff member completing this form:

Head of Service or higher:

Signed:



Signed: *Ramesh L*

Date: 10/10/2022

Date: 10/10/2022