

Equality Impact Assessment (EqIA)



You will need to produce an Equality Impact Assessment (EqIA) if:

- You are developing a new policy, strategy, or service
- You are making changes that will affect front-line services
- You are reducing budgets, which may affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles

Guidance notes on how to complete an EqIA and sign off process are available on the Hub under Equality and Diversity. You must read the [guidance notes](#) and ensure you have followed all stages of the EqIA approval process (outlined in appendix 1). Section 2 of the template requires you to undertake an assessment of the impact of your proposals on groups with protected characteristics. Equalities and borough profile data, as well as other sources of statistical information can be found on the Harrow hub, within the section entitled: [Equality Impact Assessment](#) - sources of statistical information.

Equality Impact Assessment (EqIA)

Type of Decision:	<input checked="" type="radio"/> Cabinet <input type="radio"/> Portfolio holder <input type="radio"/> Other (state)	
Title of Proposal	Review of Housing and Homelessness Strategies: Housing Allocation Scheme and Tenancy Strategy & Policy	Date EqIA created Nov 2019-Nov 2020
Name and job title of completing/lead Officer	Meghan Zinkewich-Peotti Housing Strategy Project Manager Housing Services, Community	
Directorate/ Service responsible	Community- Housing Services	
Organisational approval		
EqIA approved by Directorate Equalities Lead	Signature	Dave Corby Head of Service- Community Engagement Community- Commissioning Services <input checked="" type="checkbox"/> Tick this box to indicate that you have approved this EqIA Date of approval 13/01/2021

1. Summary of proposal, impact on groups with protected characteristics and mitigating actions
(to be completed **after** you have completed sections 2 - 5)

a) What is your proposal?

- To review and amend the Housing Allocation Scheme, the Tenancy Strategy and the Tenancy Policy to reflect a range of changes that have occurred to housing policy, legislation, statutory guidance, and local, regional, and national drivers since they were last approved.
- To retain the use of Choice Based Lettings as the method for the allocation of social housing in Harrow.
- To end the use of flexible/fixed-term tenancies for the letting of Harrow's council housing and to revert to the use of lifetime tenancies for all permanent council housing lettings, following a successful 1 year introductory tenancy.

b) Summarise the impact of your proposal on groups with protected characteristics

There is data available for some of the protected characteristics, particularly age, sex and ethnicity, but there is limited data for others. This makes it difficult to identify trends, draw statistically significant conclusions and gauge the impact of the proposed changes on all groups with different protected characteristics. Based on the data available we do not anticipate that the proposed changes will have any negative impact on any groups with any specific protected characteristics.

Housing Allocation Scheme: Retaining the use of Choice Based Lettings as the method for the allocation of social housing in Harrow preserves choice, which stakeholders have indicated is important, and is more transparent than direct lettings. Outcomes must be monitored and analysed by protected characteristics but the diversity profile of applicants on the housing register and those to whom social housing is allocated is influenced by other wider factors, such as income levels (including welfare benefits), the affordability of private rented housing and of home ownership and the supply of affordable housing in Harrow, which in turn link to socio-economic factors such as education and employment. These factors are outside of the remit of the Housing Allocation Scheme but should be explored through the Borough Plan.

Tenancy Strategy & Policy: Reverting to only offering lifetime tenancies will mean that all applicants becoming new Harrow Council tenants in the future will be offered the same type of tenancy. All current flexible tenants will be transitioned to a lifetime tenancy. Existing tenants whose tenancies started before 12 August 2013 hold a lifetime tenancy and have not been impacted by the use of flexible tenancies. Reverting to the use of lifetime tenancies will provide reassurance to any applicants or tenants who are concerned about the possibility of being required to move due to their circumstances at the point of their tenancy review.

b) Summarise any potential negative impact(s) identified and mitigating actions

There is data available for some of the protected characteristics, particularly age, sex and ethnicity, but there is limited data for others. This makes it difficult to identify trends, draw statistically significant conclusions and gauge the impact of the proposed changes on all groups with different protected characteristics.

Data is currently held across three systems (Locata, Civica and Northgate). Housing Services is migrating to a new digital platform (Cx) in 2021 and we anticipate that this will improve the recording and management of diversity data.

Based on the data available we do not anticipate that the proposed changes will have any negative impact on any groups with any specific protected characteristics. Further work is needed to monitor outcomes by protected characteristics carefully going forward.

Housing Allocation Scheme

The proposal is to retain Choice Based Lettings as the method for allocating social housing in Harrow and to address the current challenges by implementing more robustly the existing penalties for refusals and for not bidding and review again in 12 months.

In order to closely monitor outcomes and review progress in 12 months we will use the following indicators:

- Number of lettings by band, bedroom size and waiting time, broken down by the protected characteristics of the applicants
- Number of applicants by band and bedroom size who have failed to bid, broken down by the protected characteristics
- Number of applicants by band and bedroom size who have refused a property where a direct offer has been made, broken down by the protected characteristics
- Number of applicants by band and bedroom size who have refused a direct offer and been downgraded, broken down by the protected characteristics
- Type of property refused
- Reasons for refusal.

A number of features are already in place to support applicants who require assistance navigating Choice Based Lettings, including assisted bidding and automatic bidding.

Tenancy Strategy & Policy

The proposal is to end the use of flexible/fixed-term tenancies for the letting of Harrow's council housing and to revert to the use of lifetime tenancies for all permanent council housing lettings, following a successful 1 year introductory tenancy.

The original purpose for using flexible tenancies was to allow the Council to require tenants to move if they are under-occupying at the time of the tenancy review. This was expected in the long-term to benefit applicants and tenants requiring larger, family sized homes. However, there is no evidence to date that the use of flexible tenancies achieves the release of larger homes. There is currently a dedicated officer who provides assistance to under-occupiers (all tenancy types) and a range of incentives are offered including Band A+ priority on the housing register. However alternative accommodation for under-occupiers is not always readily available, particularly in view of the small social housing stock in Harrow.

In order to address the original purpose for using flexible tenancies a review of the approach to under-occupation will be undertaken in early 2021 to ensure that opportunities to release larger family sized homes are maximised.

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2. Assessing impact					
You are required to undertake a detailed analysis of the impact of your proposals on groups with protected characteristics. You should refer to borough profile data , equalities data , service user information, consultation responses and any other relevant data/evidence to help you assess and explain what impact (if any) your proposal(s) will have on each group. Where there are gaps in data, you should state this in the boxes below and what action (if any), you will take to address this in the future.		What does the evidence tell you about the impact your proposal may have on groups with protected characteristics? Click the relevant box to indicate whether your proposal will have a positive impact, negative (minor, major), or no impact			
Protected characteristic	For each protected characteristic, explain in detail what the evidence is suggesting and the impact of your proposal (if any). Click the appropriate box on the right to indicate the outcome of your analysis.	Positive impact	Negative impact		No impact
			Minor	Major	
Age	<p><u>Population of Harrow</u></p> <p>The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p> <p>At the time of the 2011 Census 20.1% of residents were children (aged 0-15), 65.8% were of working age (16-64) and 14.1% were aged 65 and above.</p> <p>The Government's population estimates as of mid-2019 show that Harrow's population now comprises 53,400 (21%) children aged 15 and under, 157,800 (63%) adults of working age (aged 16-64) and 40,000 (16%) adults aged 65 and over. As with most areas in the country, the borough has an ageing population.</p> <p><u>Housing Allocation Scheme</u></p> <p>Housing Register</p> <p>In November 2020 there were 2,081 eligible applicants on the housing register. 1,930 (92.7%) were 'homeseekers' and 151 (7.3%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>3.8% of applicants were aged under 25 years, 50.7% were aged between 25 and 45 years old, 36.4% were aged between 45 and 64 years old and 8.4% were aged 65 years and older.</p> <p>While older people are under-represented on the housing register compared to the overall population this is likely to be because of the range of other specialist housing and care options available to them, such as living with relatives, domiciliary care and residential care.</p> <p>The age profile of applicants on the housing register is influenced by other wider factors, such as income levels (including welfare benefits) by age, affordability of private rented housing and home ownership for different age groups and the supply of affordable housing in Harrow.</p> <p>New Social Lettings</p> <p>235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).</p> <p>Across the 235 permanent social lettings 13% of the new tenants were aged under 25, 34% were aged 25 to 45, 36% were aged 45 to 64 and 17% were aged 65 or over. 16% of the new general needs tenants were aged under 25, 42% were aged 25 to 45, 38% were aged 45-64 and 4% were aged 65 or over. 31% of the new sheltered housing tenants were aged 45 to 64 and 69% were aged 65 or over. This data refers to the main tenant only.</p> <p>Of the 161 permanent LA (council) lettings 39 were sheltered housing for older people and 122 were general needs housing. Overall 13% of the new tenants were aged under 25, 30% were aged 25 to 45, 39% were aged 45 to 64 and 18% were aged 65 or over. 17% of the new general needs tenants were aged under 25, 40% were aged 25 to 45, 40% were aged 45-64 and 3% were aged 65 or over. 33% of the new sheltered housing</p>				
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	<p>tenants were aged 45 to 64 and 67% were aged 65 or over. This data refers to the main tenant only.</p> <p>Of the 74 permanent RP (housing association) lettings 6 were sheltered housing for older people and 68 were general needs housing. Overall 14% of the new tenants were aged under 25, 43% were aged 25 to 45, 31% were aged 45 to 64 and 12% were aged 65 or over. 15% of the new general needs tenants were aged under 25, 47% were aged 25 to 45, 32% were aged 45-64 and 6% were aged 65 or over. 17% of the new sheltered housing tenants were aged 45 to 64 and 83% were aged 65 or over. This data refers to the main tenant only.</p> <p>The majority of sheltered housing lettings are made to applicants aged 65 and over which is expected as this type of housing is specifically for older people.</p> <p>Impact of proposal</p> <p>Overall the age profile of lettings compared to the age profile of the register shows an over-representation of younger tenants aged under 25 and of older tenants aged 65 and over and an under-representation of tenants aged 25 to 45 years. This is likely to be in part due to housing supply and the availability of 0/1 bed general needs accommodation and sheltered housing compared to family sized homes. We do not anticipate that the proposal to continue using Choice Based Lettings will have a negative impact on this protected characteristic. The proposal to create priority bandings for sheltered housing will improve the management of the allocation of those properties but is unlikely to change the outcome for this age group, as under the current policy they must already choose between general needs and sheltered housing and receive appropriate priority on the register.</p> <p><u>Tenancy Strategy & Policy</u></p> <p>Harrow Council Housing Tenants</p> <p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p>				
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At March 2020, 21% of tenants were aged 16-44, 47% were aged 45-64 and 32% were aged 65+.

Harrow Council Housing- Introductory and Flexible Tenancies

Introductory (or probationary) tenancies: As at October 2020 there were a total of 112 existing introductory tenants. 73% of introductory tenants were aged 16 - 45; 13% were aged 45-64 and 14% were aged 65+. Under the current Tenancy Policy their introductory tenancies are expected to be converted to flexible tenancies, which would then be reviewed every 5 years. Reverting to only using lifetime tenancies will positively impact this group as their introductory tenancies will be converted to lifetime tenancies instead.

Flexible (fixed-term) tenancies: As at October 2020 there were a total of 434 existing flexible tenants. 82% of tenants were aged 16-45; 14% were aged 45-64 and 4% were 65+. Under the current policy their flexible tenancies are reviewed every 5 years. Reverting to only using lifetime tenancies will positively impact this group as their flexible tenancies will be converted to lifetime tenancies.

Impact of proposal

Currently those under 45 years are more likely to be impacted by the use of flexible tenancies as people in this age group comprise the largest group of 'homeseekers' on the housing register and are the largest group being offered new tenancies with Harrow Council.

Older applicants receiving their first tenancy are less likely to be adversely impacted by the use of flexible tenancies as those moving into sheltered accommodation are currently awarded a lifetime tenancy, as are those aged 65 (or state pension age) moving into general needs one-bed homes. Existing flexible tenants in general needs one-bed homes attaining 65 (or state pension age) at the time of tenancy review are also awarded a lifetime tenancy.

	<p>Tenants who are under-occupying larger sized general needs housing, such as those whose adult children have moved out, may be concerned about the possibility that they may be pressured to move to a smaller home at the time of the tenancy review. Lifetime tenancies will provide reassurance to tenants who are concerned about this.</p> <p>Tenants who have young and school-aged children may be concerned about the possibility that they will be asked to move at the time of the tenancy review which would interrupt their children’s education or that they will be required to move if their children have reached adulthood. Lifetime tenancies will provide reassurance to any applicants or tenants who are concerned about this.</p> <p>The original purpose for using flexible tenancies was to allow the Council to require tenants to move if they are under-occupying family sized homes at the time of the tenancy review so it is possible that tenants who are overcrowded, such as some tenants with children, may face a longer wait for larger properties if the use of flexible tenancies ends. However there is no evidence to date that the use of flexible tenancies achieves the release of larger homes.</p> <p>Reverting to only offering lifetime tenancies will mean that all applicants becoming new Harrow Council tenants in the future will be offered the same type of tenancy. All current flexible tenants will be transitioned to a lifetime tenancy. Existing tenants whose tenancies started before 12 August 2013 hold a lifetime tenancy and have not been impacted by the use of flexible tenancies.</p> <p>In order to address the original purpose for using flexible tenancies a review of the approach to under-occupation will be undertaken in early 2021 to ensure that opportunities to release larger family sized homes are maximised.</p>				
<p>Disability</p>	<p><u>Population of Harrow</u></p> <p>The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government’s population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

In the ONS Annual Population Survey (July 2019 to June 2020) 15% of Harrow's working age population classified themselves as disabled, a total of 23,500 people. 4,176 individuals-received Disability Living Allowance (DLA) in February 2020. (DLA is currently being replaced by Personal Independence Payment (PIP) for disabled people, leading to a decline in the number of DLA claimants in recent years. Applicants for DLA currently have to be aged under 16.)

Housing Allocation Scheme

Housing Register

In November 2020 there were 2,081 eligible applicants. 1,930 (92.7%) were 'homeseekers' and 151 (7.3%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property.

Some applicants are awarded priority Band A+ or A for 'Medical' reasons. Others with disabilities or long-term health conditions may have cumulative needs and be given priority under a different reason such as 'Severe Hardship' or 'Social Hardship'. It is also likely that applicants in categories such as 'Under-Occupation' and 'Elderly Sheltered' are disabled or have a long-term health condition. Unlike some other protected characteristics, the status of disability can change. Whilst we record this information at the application stage and again at the offer/letting stage, and it is the responsibility of the applicant to notify us of changes in their circumstances, we are unable to keep every record up-to-date on the Housing Register. For these reasons there is currently limited comprehensive data on disability.

New Lettings

235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).

	<p>There is limited data on disability. However, once a disability is identified which has an impact on the type of housing that is suitable, any offer of housing will take this into account. We require that 10% of all new affordable homes are built to wheelchair standard. We also make adaptations to existing homes as specified by OT's. Other disability needs may be met through support services.</p> <p>Impact of proposal</p> <p>We do not have sufficient data on disability to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group as the assessment process for dealing with housing needs relating to disability has not changed.</p> <p><u>Tenancy Strategy & Policy</u></p> <p>Harrow Council Housing Tenants</p> <p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p> <p>Approximately 23% of Council tenants have declared that they have a disability.</p> <p>Harrow Council Housing- Introductory and Flexible Tenancies</p> <p>Introductory (or probationary) tenancies: As at October 2020 there were a total of 112 existing introductory tenants. Less than 2% of introductory tenants had declared a disability and the proposed change to award an introductory tenancy followed by a lifetime tenancy may have a positive impact in terms of relieving any confusion or concern that existing introductory tenants may have regarding their tenancy status and the review process.</p> <p>The proposed change is unlikely to have a negative impact on future introductory tenants as they will have an expectation of their tenancy converting to a lifetime tenancy.</p>				
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	<p>Flexible (fixed-term) tenancies: As at October 2020 there were a total of 434 existing flexible tenants. Approximately 12% of those with a flexible tenancy had declared a disability.</p> <p>The current Tenancy Policy includes a number of 'automatic renewal' categories, including:</p> <ul style="list-style-type: none"> • tenants or a member of the household with a physical disability and receiving qualifying disability benefits • tenants with a member of the household with a severe learning disability or enduring mental health needs confirmed by Adult Social Care or Children's Services • tenants receiving continued support from the Leaving Care team. <p>This means that following a review meeting, Harrow Council tenants in the above categories will always be offered a further 5 year flexible tenancy.</p> <p>Impact of proposal</p> <p>Reverting to only using lifetime tenancies will not impact this group's security of tenure (due to the automatic renewal categories in the current Tenancy Policy) but as their flexible tenancies will be converted to lifetime tenancies this may have a positive impact in terms of relieving any confusion or concern that this group may have regarding their tenancy status and the review process.</p> <p>Releasing adapted properties where the occupant requiring the adaptations no longer resides in the property is not reliant on the use of flexible tenancies as there are other mechanisms available to address this scenario.</p>				
<p>Gender reassignment</p>	<p><u>Population of Harrow</u></p> <p>The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p> <p>There is limited data held about this protected characteristic for the Harrow population. The England/Wales Census and Scottish Census have not asked if people identify as</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>transgender. The charity GIRES estimated in their Home Office funded study in 2009 the number of transgender people in the UK to be between 300,000 and 500,000. More recently Stonewall advised that it is estimated that around 1% of the population might identify as trans, including people who identify as non-binary. This would represent about 600,000 trans and non-binary people in Britain and about 2,500 people in Harrow.</p> <p><u>Housing Allocation Scheme</u></p> <p>Housing Register</p> <p>In November 2020 there were 2,081 eligible applicants. 1,930 (92.7%) were 'homeseekers' and 151 (7.3%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property.</p> <p>There is limited data on gender reassignment.</p> <p>New Lettings</p> <p>235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).</p> <p>There is limited data on gender reassignment.</p> <p>Impact of proposal</p> <p>We do not have sufficient data on gender reassignment to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p> <p><u>Tenancy Strategy & Policy</u></p>				

	<p>Harrow Council Housing Tenants</p> <p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p> <p>No Council tenants are recorded as identifying as transgender.</p> <p>Harrow Council Housing- Introductory and Flexible Tenancies</p> <p>Introductory (or probationary) tenancies: As at October 2020 there were a total of 112 existing introductory tenants.</p> <p>Flexible (fixed-term) tenancies: As at October 2020 there were a total of 434 existing flexible tenants.</p> <p>There is limited data about gender reassignment.</p> <p>Impact of proposal</p> <p>We do not have sufficient data on gender reassignment to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p>				
<p>Marriage and Civil Partnership</p>	<p><u>Population of Harrow</u></p> <p>The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p> <p>At the time of the 2011 Census 54% of Harrow's residents were married, which was the highest level in London. 21% of households were married, or in same-sex civil partnerships, with dependent children, the highest level in London.</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	<p>At October 2020 there have been 144 Same Gender Civil Partnerships in Harrow, 25 of which has been converted to a Marriage. There have been 8 Opposite Gender Civil Partnerships. There have been 57 Same Sex marriages.</p> <p><u>Housing Allocation Scheme</u></p> <p>Housing Register</p> <p>In November 2020 there were 2,081 eligible applicants. 1,930 (92.7%) were 'homeseekers' and 151 (7.3%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property.</p> <p>There is limited data on marriage and civil partnership.</p> <p>New Lettings</p> <p>235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).</p> <p>There is limited data on marriage and civil partnership.</p> <p>Impact of proposal</p> <p>We do not have sufficient data on marriage and civil partnership to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p> <p><u>Tenancy Strategy & Policy</u></p> <p>Harrow Council Housing Tenants</p>				
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	<p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p> <p>There is limited data on marriage and civil partnership.</p> <p>Harrow Council Housing- Introductory and Flexible Tenancies</p> <p>Introductory (or probationary) tenancies: As at October 2020 there were a total of 112 existing introductory tenants.</p> <p>Flexible (fixed-term) tenancies: As at October 2020 there were a total of 434 existing flexible tenants.</p> <p>There is limited data on marriage and civil partnership.</p> <p>Impact of proposal</p> <p>We do not have sufficient data on marriage and civil partnership to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p> <p>Sole tenants who request a joint tenancy following a marriage or civil partnership will currently not be granted this request during the life of a flexible tenancy. These requests will be granted during a lifetime tenancy. This change will therefore have a positive impact on those tenants making this type of request.</p>				
<p>Pregnancy and Maternity</p>	<p><u>Population of Harrow</u></p> <p>The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p> <p>ONS births figures show Harrow as having 3,526 live births in 2019. 14 live births per 1000 population is higher than the England & Wales average of 10.8.</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p><u>Housing Allocation Scheme</u></p> <p>Housing Register</p> <p>In November 2020 there were 2,081 eligible applicants. 1,930 (92.7%) were 'homeseekers' and 151 (7.3%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property.</p> <p>There is limited information specifically about pregnancy and maternity (with children aged under 2 years).</p> <p>Unlike some other protected characteristics, the status of pregnancy and maternity changes. Whilst we record this information at the application stage and again at the offer/letting stage, and it is the responsibility of the applicant to notify us of changes in their circumstances, we are unable to keep every record up-to-date on the Housing Register.</p> <p>New Lettings</p> <p>235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).</p> <p>208 permanent council lettings were made in 2019/20, 167 of general needs properties and 41 of sheltered housing for older people. Of these new tenants 1 was pregnant and 11 had children aged under 2.</p> <p>There is limited other information specifically about pregnancy and maternity (with children aged under 2 years).</p>				
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	<p>Impact of proposal</p> <p>We do not have sufficient data on pregnancy and maternity (with children aged under 2 years) to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p> <p><u>Tenancy Strategy & Policy</u></p> <p>Harrow Council Housing Tenants</p> <p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p> <p>There is limited information specifically about pregnancy and maternity (with children aged under 2 years). Existing tenants are not obliged to inform their landlord about such changes to their circumstances and are most likely to advise their landlord of changes to their household in relation to requests to move.</p> <p>Harrow Council Housing- Introductory and Flexible Tenancies</p> <p>Introductory tenancies: As at October 2020 there were a total of 112 existing introductory tenants. 28% of those with introductory tenancies were in family sized accommodation. A higher proportion of introductory tenants are in one-bed accommodation as tenants in all age groups are awarded introductory tenancies whereas only working age tenants are awarded flexible tenancies.</p> <p>Flexible (fixed-term) tenancies: As at October 2020 there were a total of 434 existing flexible tenants. Of those tenants awarded a flexible tenancy, 53% were awarded to those in family size accommodation and 47% awarded to those in one bed properties. Families are slightly more impacted by the award of a fixed-term tenancy than those in one-bed accommodation (who are more likely to be single people).</p> <p>Impact of proposal</p>				
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	<p>We do not have sufficient data on pregnancy and maternity (with children aged under 2 years) to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this group.</p>				
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Race/ Ethnicity	<p><u>Population of Harrow</u></p> <p>The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p> <p>Harrow's population is one of the most diverse nationally. 64% of Harrow's population is from a BAME background. 45.4% of the population identify as Asian, which ranks 2nd nationally and 9.7% are of Black heritage. Since 2001 there has been a 59.4% increase in the number of residents who are Asian. The largest ethnic groups in the borough are Indian, followed by Kenyans and Sri Lankans. Harrow is home to the largest Sri Lankan born community in the country. The top three nationalities of the most recent arrivals to the borough are Romanian, Indian, and Polish.</p> <p><u>Housing Allocation Scheme</u></p> <p>Housing Register</p> <p>In November 2020 there were 2,081 eligible applicants. 1,930 (92.7%) were 'homeseekers' and 151 (7.3%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property.</p> <p>78% of applicants disclosed their ethnicity and 31% of these were White, 29% were Asian, 26% were Black, 7% were of Mixed ethnicity and 8% were of Other ethnicity.</p> <p>Black applicants were over-represented on the housing register (26%), as they were at the Initial Assessment stage of the homelessness process (28% of those assessed in 2019/20) against just 8% of the population. White and Asian applicants were under-represented at 29% of applicants against 42% of the population and 25% of applicants against 43% of the population respectively.</p> <p>Whilst transfer applicants account for just 7% of the housing register, White applicants account for 54% of known ethnicity in this group. This may reflect the proportion of long-term tenants whose needs have changed over decades, including those wishing to move to sheltered accommodation, under-occupiers and those with medical needs.</p>				
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	<p>This may also reflect cultural differences in multi-generational living arrangements. Asian applicants make up 24% of this group and Black applicants 16%.</p> <p>65 of the 99 homeseekers and transfer applicants in Band A+ were under-occupiers and at least 38 of these were White. Ethnicity wasn't recorded in 18 cases. This is likely to reflect older people who have been council tenants for many years and less likely to reflect the profile across all council tenants or residents.</p> <p>58 of the 100 applicants in Band A had a 'Medical' band reason and, whilst ethnicity wasn't recorded in 13 cases, 17 were Asian, 13 were Black and 9 were White.</p> <p>New Lettings</p> <p>235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).</p> <p>Across the 235 permanent social lettings 24% of the new tenants were White, 20% were Black, 17% were Asian, 5% were of Mixed ethnicity, 2% were of Other ethnicity and 31% did not disclose their ethnicity. 23% of the new general needs tenants were White, 22% were Black, 15% were Asian, 5% were of Mixed ethnicity, 3% were of Other ethnicity and 33% did not disclose their ethnicity. 29% of the new sheltered housing tenants were White, 11% were Black, 24% were Asian, 7% were of Mixed ethnicity, 2% were of Other ethnicity and 27% did not disclose their ethnicity.</p> <p>Of the 161 permanent LA (council) lettings 39 were sheltered housing for older people and 122 were general needs housing. Overall 24% of the new tenants were White, 18% were Black, 19% were Asian, 5% were of Mixed ethnicity, 2% were of Other ethnicity and 32% did not disclose their ethnicity. 23% of the new general needs tenants were White, 20% were Black, 16% were Asian, 6% were of Mixed ethnicity, 2% were of Other ethnicity and 33% did not disclose their ethnicity. 26% of the new sheltered housing</p>				
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	<p>tenants were White, 13% were Black, 28% were Asian, 5% were of Mixed ethnicity, 2% of Other ethnicity and 26% did not disclose their ethnicity.</p> <p>Of the 74 permanent RP (housing association) lettings 6 were sheltered housing for older people and 68 were general needs housing. Overall 25% of the new tenants were White, 23% were Black, 14% were Asian, 4% were of Mixed ethnicity, 4% were of Other ethnicity and 30% did not disclose their ethnicity. 24% of the new general needs tenants were White, 25% were Black, 15% were Asian, 3% were of Mixed ethnicity, 4% were of Other ethnicity and 29% did not disclose their ethnicity. 50% of the new sheltered housing tenants were White, 17% were of Mixed ethnicity and 33% did not disclose their ethnicity.</p> <p>Impact of proposal</p> <p>The missing ethnicity data for new lettings (31% across all lettings) makes it difficult to draw statistically significant conclusions and assess the impact of the proposed change. Further work is needed to monitor outcomes by ethnicity carefully going forward.</p> <p>Black applicants were over-represented on the housing register (26%) compared to 8% of the population. The diversity profile of applicants on the housing register and those to whom social housing is allocated, including ethnicity, is influenced by other wider factors, such as income levels (including welfare benefits), the affordability of private rented housing and of home ownership and the supply of affordable housing in Harrow, which in turn link to socio-economic factors such as education and employment. These factors are outside of the remit of the Housing Allocation Scheme but should be explored through the Borough Plan.</p> <p>Of the general needs lettings where ethnicity was disclosed/recorded 32% of new tenants were Black (30% for new council tenants and 35% for new RP (housing association) tenants). The missing ethnicity data for new lettings makes it difficult to draw statistically significant conclusions. Based on the data available Black applicants are over-represented in new lettings compared to the housing register which indicates Choice Based Lettings does not negatively impact on the outcome for Black applicants.</p> <p>Tenancy Strategy & Policy</p>				
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	<p>Harrow Council Housing Tenants</p> <p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p> <p>Of the 84% who have disclosed their ethnicity, the largest single group housed within the Council’s stock is White, making up 47% of known ethnicity. The next largest groups are Asian at 24% and Black at 20%. This ratio is disproportionate to Harrow’s population, but this may be due to the high proportion of longstanding tenants in a borough with a rapid demographic change, low churn of properties, very little social housing and the discharge of housing duty into the private sector since 2011.</p> <p>Harrow Council Housing- Introductory & Flexible Tenancies</p> <p>Introductory tenancies: As at October 2020 there were a total of 112 existing introductory tenants. The majority of tenants with introductory tenancies (40%) identified as White British. 11% of introductory tenants were Black or of Black mixed ethnicity and 18% Asian (with the largest proportion being Indian at 6%).</p> <p>Flexible (flexible) tenants: As at October 2020 there were a total of 434 existing flexible tenants. The majority of tenants 41% with flexible tenancies identified as White British. 17.5% of tenants are Black and/or of Black Mixed ethnicity and 16% Asian (with the largest proportion being Indian at 8%).</p> <p>Impact of proposal</p> <p>The Housing Allocation Scheme impacts on which applicants are eligible to receive an offer of social housing and the Tenancy Strategy & Policy states which type of tenancy a successful applicant should receive. We do not anticipate that the proposed change to revert to awarding lifetime tenancies will have a negative impact on any particular ethnic group.</p>				
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Religion or belief	<p><u>Population of Harrow</u> The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government’s population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p> <p>Religious diversity is strong in Harrow. At the 2011 Census Harrow was the most religiously diverse borough in the country. Harrow had the highest number (and proportion) of Hindu followers in the country (25.3%), the highest number of Jains (2.2%) and the second highest number of Zoroastrians. Harrow 's Jewish community was the sixth largest nationally. 37.3% of residents were Christians (the 5th lowest proportion in the country) and 12.5% were Muslims. Harrow had the 2nd lowest ranking for ‘no religion’.</p> <p><u>Housing Allocation Scheme</u></p> <p>Housing Register</p> <p>In November 2020 there were 2,081 eligible applicants. 1,930 (92.7%) were ‘homeseekers’ and 151 (7.3%) were ‘transfer applicants’- those already in social housing but with an identified need to move to a more suitable property.</p> <p>In November 2020 only 32.3% of applicants disclosed their religion. Of these applicants 39% of applicants were Christian (12.6% of total), 35.4% were Muslim (11.4% of total), 12.8% had no religion (4.1% of total) and 9.5% were Hindu (3.1% of total). The remainder were Buddhist, Jewish, Sikh or from other religions.</p> <p>New Lettings</p> <p>235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).</p>				
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	<p>There is limited data on religion or belief.</p> <p>Impact of proposal</p> <p>We do not have sufficient data on religion or belief to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on any particular religious or faith group.</p> <p><u>Tenancy Strategy & Policy</u></p> <p>Harrow Council Housing Tenants</p> <p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p> <p>Only 58% of tenants have disclosed their religion. Of these they are Christian 53%, Muslim 17%, Hindu and Jain 10%, Prefer Not To Say 5%, No religion/None 11%, and Other 4% (including Buddhist, Jewish, Humanist, Rastafarian, Sikh).</p> <p>Harrow Council Housing- Introductory Flexible Tenancies</p> <p>Introductory tenancies: As at October 2020 there were a total of 112 existing introductory tenants. Only 4% of introductory tenants declared their religion.</p> <p>Flexible (fixed-term) tenancies: As at October 2020 there were a total of 434 existing flexible tenants. Only 18% of flexible tenants declared their religion, with an equal split between Christians and Muslims. Other religions did not have a significant declaration. Tenants are not obliged to declare their religion.</p> <p>Impact of proposal</p>				
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	<p>We do not have sufficient data on religion or belief to assess the impact of the proposed change to revert to awarding lifetime tenancies, but we do not anticipate that it will have a negative impact on any particular religious or faith group.</p>				
<p>Sex</p>	<p><u>Population of Harrow</u></p> <p>The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p> <p>The 2011 Census showed that in Harrow 49.4 per cent of residents were males and 50.6 per cent were females. The Government's population estimates as of mid-2019 show that the total population of Harrow is made up of 125,800 men and 125,400 women. Overall, the number of males and females living in Harrow is very similar.</p> <p><u>Housing Allocation Scheme</u></p> <p>Housing Register</p> <p>In November 2020 there were 2,081 eligible applicants. 1,930 (92.7%) were 'homeseekers' and 151 (7.3%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property.</p> <p>65% of these applicants are female and 35% male.</p> <p>New Lettings</p> <p>235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>Across the 235 permanent social lettings 57% of the new tenants were female and 43% were male. 63% of the new general needs tenants were female and 37% were male. 33% of the new sheltered housing tenants were female and 67% were male.</p> <p>Of the 161 permanent LA (council) lettings 39 were sheltered housing for older people and 122 were general needs housing. Overall 55% of the new tenants were female and 45% were male. 62% of the new general needs tenants were female and 38% were male. 31% of the new sheltered housing tenants were female and 69% were male.</p> <p>Of the 74 permanent RP (housing association) lettings 6 were sheltered housing for older people and 68 were general needs housing. Overall 62% of the new tenants were female and 38% were male. 63% of the new general needs tenants were female and 37% were male. 50% of the new sheltered housing tenants were female and 50% were male.</p> <p>Impact of proposal</p> <p>Female applicants are over-represented on the housing register compared to the general population. Single-parent households with children are more likely to be eligible for priority than other family structures, and these are more likely to be headed by a female applicant.</p> <p>Of the general needs lettings in 19/20 38% of new council tenants were male and 62% were female, very similar proportions as for new RP (housing association) tenants. This is very similar to the profile of the housing register. We do not anticipate that the proposed change will have a negative impact on this protected characteristic.</p> <p><u>Tenancy Strategy & Policy</u></p> <p>Harrow Council Housing Tenants</p> <p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p>				
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	<p>At March 2020, 63% of these tenants were female and 37% male. This data refers to the main tenant only.</p> <p>Harrow Council Housing- Introductory and Flexible Tenancies</p> <p>Introductory (or probationary) tenancies: As at October 2020 there were a total of 112 existing introductory tenants. 45% of these tenants were female and 55% were male. This data refers to the main tenant only.</p> <p>Flexible (fixed-term) tenancies: As at October 2020 there were a total of 434 existing flexible tenants. 59% of these tenants were female and 41% were male. This data refers to the main tenant only.</p> <p>Impact of proposal</p> <p>The Housing Allocation Scheme impacts on which applicants receive an offer of social housing and the Tenancy Strategy & Policy states which type of tenancy a successful applicant should receive. We do not anticipate that the proposed change will have a negative impact on this this protected characteristic.</p>				
<p>Sexual Orientation</p>	<p><u>Population of Harrow</u></p> <p>The total usual resident population in Harrow on Census Day (27 March 2011) was 239,100 people. The Government's population estimates as of mid-2019 show that the total population of Harrow is now 251,200.</p> <p>ONS data shows that the proportion of the UK population aged 16 years and over identifying as heterosexual or straight decreased from 95.3% in 2014 to 94.6% in 2018 and the proportion identifying as lesbian, gay or bisexual (LGB) increased from 1.6% in 2014 to 2.2% in 2018. In 2018, there were an estimated 1.2 million people aged 16 years and over identifying as LGB, with men (2.5%) more likely to identify as LGB than women (2.0%) in 2018. Younger people (aged 16 to 24 years) were most likely to identify as LGB in 2018 (4.4%). More than two-thirds (68.7%) of people who identified as LGB were single (never married or in a civil partnership).</p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	<p>Among English regions, people in London were most likely to identify as LGB (2.8%) but organisations such as Stonewall believe the true figure to be higher. This would equate to at least 7,000 Harrow residents identifying as lesbian, gay or bisexual (LGB) but there is limited data held about the protected characteristic of sexual orientation for the Harrow population.</p> <p><u>Housing Allocation Scheme</u></p> <p>Housing Register</p> <p>In November 2020 there were 2,081 eligible applicants on the housing register. 1,930 (92.7%) were 'homeseekers' and 151 (7.3%) were 'transfer applicants'- those already in social housing but with an identified need to move to a more suitable property.</p> <p>There is limited data about sexual orientation. Only 29% of applicants have disclosed their sexual orientation.</p> <p>New Lettings</p> <p>235 permanent social lettings were made in 2019/2020 that are within the scope of the Housing Allocation Scheme, 45 sheltered housing for older people and 190 general needs. Of these 161 were permanent LA (council) lettings (39 sheltered housing for older people and 122 general needs housing) and 74 were permanent RP (housing association) lettings (6 sheltered housing for older people and 68 general needs housing).</p> <p>There is limited data about sexual orientation.</p> <p>Impact of proposal</p> <p>We do not have sufficient data on sexual orientation to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this protected characteristic.</p> <p><u>Tenancy Strategy & Policy</u></p>				
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	<p>Harrow Council Housing Tenants</p> <p>Approximately 5% of households in Harrow live in local authority social housing and at March 2020 there were 5,747 tenants (including joint tenants) living in 4,738 Council properties.</p> <p>There is limited data about sexual orientation. Only 36% have disclosed their sexual orientation.</p> <p>Harrow Council Housing- Introductory & Flexible Tenancies</p> <p>Introductory (or probationary) tenancies: As at October 2020 there were a total of 112 existing introductory tenants. There is limited data about sexual orientation.</p> <p>Flexible (fixed-term) tenancies: As at October 2020 there were a total of 434 existing flexible tenants. There is limited data about sexual orientation.</p> <p>Impact of proposal</p> <p>We do not have sufficient data on sexual orientation to assess the impact of the proposed change, but we do not anticipate that it will have a negative impact on this protected characteristic.</p>				
<p>2.1 Cumulative impact – considering what else is happening within the Council and Harrow as a whole, could your proposals have a cumulative impact on groups with protected characteristics?</p> <p><input type="checkbox"/> Yes No <input checked="" type="checkbox"/></p>					
<p>If you clicked the Yes box, which groups with protected characteristics could be affected and what is the potential impact? Include details in the space below</p>					

2.2 Any other impact - considering what else is happening nationally/locally (national/local/regional policies, socio-economic factors etc), could your proposals have an impact on individuals/service users, or other groups?

Yes No

Due to the Covid-19 pandemic more Harrow residents are struggling financially, including finding it challenging to pay their rent or mortgage. This is in addition to the existing affordability challenges of housing in Harrow. This may lead to an increase in demand for social housing in Harrow, which is limited in supply. The Housing Allocation Scheme may therefore impact on these residents, as it sets out the policy for the allocation of social housing in Harrow. Based on the data available we do not anticipate that it will have a negative impact on any specific protected characteristic.

The prospectus for new grant funded Affordable Homes from 2023 requires these to be let on lifetime tenancies. This requirement will be met by the proposed change to the Tenancy Strategy & Policy.

3. Actions to mitigate/remove negative impact

Only complete this section if your assessment (in section 2) suggests that your proposals may have a negative impact on groups with protected characteristics. If you have not identified any negative impacts, please complete sections 4 and 5.

In the table below, please state what these potential negative impact (s) are, mitigating actions and steps taken to ensure that these measures will address and remove any negative impacts identified and by when. Please also state how you will monitor the impact of your proposal once implemented.

State what the negative impact(s) are for each group, identified in section 2. In addition, you should also consider, and state potential risks associated with your proposal.	Measures to mitigate negative impact (provide details, including details of and additional consultation undertaken/to be carried out in the future). If you are unable to identify measures to mitigate impact, please state so and provide a brief explanation.	What action (s) will you take to assess whether these measures have addressed and removed any negative impacts identified in your analysis? Please provide details. If you have previously stated that you are unable to identify measures to mitigate impact, please state below.	Deadline date	Lead Officer

4. Public Sector Equality Duty

How does your proposal meet the Public Sector Equality Duty (PSED) to:

1. Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010
2. Advance equality of opportunity between people from different groups
3. Foster good relations between people from different groups

The proposed changes to the strategies and policies are intended to make them more relevant, compliant, and clearer to all stakeholders. This is particularly important so that all households can make realistic and informed decisions about their housing options.

Up to date strategies and policies that have been approved after consultation minimises the risk of unlawful discrimination.

The aim of Harrow's Housing Allocation Scheme is to meet local priority housing needs, make the best use of Harrow's very limited social housing stock and be fairer to all by ensuring that the relatively few residents who are in the most need of housing, wait as short a time as possible for an allocation of public rented housing.

5. Outcome of the Equality Impact Assessment (EqIA) click the box that applies

Outcome 1

No change required: the EqIA has not identified any potential for unlawful conduct or disproportionate impact and all opportunities to advance equality of opportunity are being addressed

Outcome 2

Adjustments to remove/mitigate negative impacts identified by the assessment, or to better advance equality, as stated in section 3&4

Outcome 3

This EqIA has identified discrimination and/ or missed opportunities to advance equality and/or foster good relations. However, it is still reasonable to continue with the activity. Outline the reasons for this and the information used to reach this decision in the space below.

Include details here