

Equalities Impact Assessment

Proposal Title: Allocations Policy

Author: Tom Tyson

Who will sign off the assessment? : Fiona Connolly, Corporate Director of Housing and Adult Social Care

Q1a. What is changing

Lambeth is proposing to make a number of changes to its allocation scheme to make the best use of the limited number of lettings that are available and that the scheme is as fair as possible.

- a. Households in Temporary Accommodation (TA) to move from Band C1 to Band B.

We estimate this will mean an additional 120 lettings a year will go to people in temporary accommodation, with fewer lettings going to people in Band B. Applicants in other bands are unaffected by this change.

- b. Offers are limited to one for homeless households and two for other households. This rule will not be enforced for under occupiers and care leavers.

Homeless households would have their duty discharged. Other households would need to reapply to join the register and would lose their waiting time. Any offer would have to be "reasonable". As a new policy we will need to make sure that applicants understand the changes and that we are clear what reasonable grounds for refusal might be.

- c. Band D will be removed.

Band D contains households who have applied for social housing but are in no identified housing need or any chance of successfully bidding on a property.

- d. Waiting time to be from time in Band rather than time of initial application.

This means that people in with an urgent need will be housed after a similar waiting period.

- e. Applicants will be required to log in annually to keep their accounts active. Under occupiers, those with medical needs, care leavers and TA occupants will be exempted from this rule.

Many of those on the waiting list have been there for a long time and are likely to have changed circumstances including having move away from Lambeth.

There will be a gradual implementation of this with scope for applicant to have their accounts reactivated.

The cabinet report gives more details on how the scheme currently operates and the different groups in different bands.

Consultation on the proposed changes

We consulted with residents from October 2022 – mid-January 2023 to seek views on the draft strategy, via a range of methods including an online survey, drop in sessions and meetings with residents and partners. The consultation was advertised on estates using posters and was also a topic of conversation at the Residents’ Assembly in November. There were over 2,000 responses to the consultation.

- Ethnicity: 47.9% Black, 21.3% White, 19.1% Other.
- Age: 3.3% <24; 24.3% 25-34; 29.8% 35-44; 36.5% 45-64; 6% 65+
- Gender: 72.6% Female, 26.5% Male.
- Disability: 38.3% Yes, 61.8% No.

The profile of respondents broadly reflects the characteristics of those on the housing register.

All of the proposals being introduced have more respondents supporting them than disagreeing with them. For more details of the consultation results please see [Allocations Consultation Report.docx](#).

Q1b. Who will be involved in approving this decision?

This is a cabinet decision.

Q2a. What do we know about the people who will be impacted by this change?

- a) Households in temporary accommodation to move from Band C1 to Band B

This change obviously will impact on people in temporary accommodation but also those in Band B who will now be competing with people in temporary accommodation, with allocation determined on waiting time. It is difficult to predict exactly what the change will mean but modelling carried out by the council’s corporate data team suggests and this would mean an additional 120 people in TA would have an offer of accommodation with conversely 120 fewer people in Band B bidding successfully.

In November, there are currently 5584 applicants in Band B on the Lambeth waiting list. These are households with *“an urgent housing need: Severe overcrowding (lacking 2 or more bedrooms). Urgent need to move on medical grounds. Those at risk of homelessness who are working with the council to prevent homelessness.”*

Looking at the reasons for Band B, it is split roughly into thirds, 33% overcrowding, 29% medical needs, and 37% prevention cases.

There are some issues with the data on the system with 12% of cases missing information where it is not specified why applicants are in Band B, and it is also difficult to identify where applicants may be prevention cases and also have a medical need / overcrowding.

Table below shows age breakdown of those in Band B. The vast majority are in the 25-60 bracket with an average age of 43. This is higher than the borough national average of 33 and higher than the average of those in TA. The number of young adults in the 18-24 bracket is disproportionately very low (3% and the Lambeth figure for 16-24 years stood at 11.8% in 2021).

Age Band	Number of applicants
18-24	171

25-60	4808
60-80	410
80+	195
Total	5584

Age breakdown of Band B applicants, November 2023

19% of Band B applicants are assessed as having mobility needs, the majority of whom require level access housing with a small proportion requiring an adapted home.

It is important to note that wheelchair, mobility adapted and level access housing will wherever possible be allocated to someone who needs this type of housing.

The ethnic make-up of Band B as shown in table below reflects the diversity in the borough but despite only a quarter of Lambeth's population belonging to the Black/Black British community (24%), this group is disproportionately represented in Band B applicants on the waiting list as close to half of the residents are from this community (49%).

Ethnicity	Number of applicants
Black British African	1369
White Other	986
Black British Caribbean	985
White British	603
Other	475
Black Other	388
Mixed Race	290
Asian	241
Race not recorded	204
Chinese	16
Vietnamese	11
Arab	9
Latin American	7
Total	5584

Ethnicity breakdown of Band B applicants, November 2023

Band B applicants are disproportionately more female than male (71% female, 29% male) when compared to Lambeth figures (51.5%) and nationwide. This is due to women having dependents and the classification of this as a priority need for prevention cases and being in need of appropriate social housing.

Gender	Number of applicants
Female	3985
Male	1597
Other	1
Prefer not to say	1
Total	5584

Gender breakdown of Band B applicants, November 2023

Over half of Band B applicants are single/single parent households (56%), which is line with Lambeth residents in general, who are more likely to be single with over 3 in 5 adults having never been married or in a registered partnership. It is worth noting that the vast majority are lone female parents as women are generally disproportionately represented in Band B as mentioned previously. In the table below, you can see this breakdown.

Household type	Number of applicants
All adults	835
Couple with children	1617
Lone female parent	2098
Lone male parent	235
Single female	344
Single male	455
Total	5584

Household type breakdown of Band B applicants, November 2023

Table below shows age breakdown of TA residents and clearly the vast majority are in the 25-60 bracket with an average age of 39. The number of elderly TA residents is relatively small, given the higher likelihood of being placed in TA as an adult with dependents. This breakdown mirrors the borough's disproportionately high number of young adults.

Age band	Number of applicants
18-24	405
25-60	3532
60-80	246
80+	12
Total	4195

Age breakdown of TA residents, November 2023

3% of TA residents (in band C1) are assessed as needing mobility housing.

The ethnic make-up of TA residents as shown in table below reflects the diversity in the borough but despite only a quarter of Lambeth's population belonging to the Black/Black British community (24%), this group is disproportionately represented in TA as over half of the residents are from this community (56%).

Ethnicity	Number of residents
Black British African	1117
Black British Caribbean	821
White Other	509
Black Other	404
White British	327
Other	306
Race not recorded	256
Mixed Race	212

Asian	170
Latin American	28
Arab	24
Vietnamese	11
Chinese	10
Total	4195

Ethnicity breakdown of TA residents, November 2023

TA residents are disproportionately more female than male (74% female, 26% male) when compared to Lambeth figures (51.5%) and nationwide. This is due to women having dependents and the classification of this as a priority need for a relief duty in the form of temporary accommodation.

Gender	Number of residents
Female	3088
Male	1099
Other	3
Prefer not to say	5
Total	4195

Gender breakdown of TA residents, November 2023

The majority of TA residents are single/single parent households (82%), which is line with Lambeth residents in general, who are more likely to be single with over 3 in 5 adults having never been married or in a registered partnership. It is worth noting that the vast majority are lone female parents as women are generally disproportionately represented in TA as mentioned previously. In the table below, you can see this breakdown.

Household type	Number of TA residents
All adults	270
Couple with dependents	501
Lone female parent	2245
Lone male parent	208
Single female	427
Single male	544
Total	4195

Household type breakdown of TA residents, November 2023

- b. Offers are limited to one for homeless households and two for other households

Analysis of the housing register (March 2023) showed 152 applicants with the most recent bid status as "bid refused". It does not show people who have refused an offer but accepted a subsequent offer, but gives an indication.

Currently there is no impact for households who refuse offers so we need to be cautious about making too many predictions for how this would translate once the policy is introduced.

The data we have shows a slight under representation of Black and minority applicants refusing properties.

Black	76
Asian	4
Mixed	1
Other	12
Not recorded	17
White	42
TOTAL	152

Offer refused by race (March 2023)

There is an over representation of offers being refused by older people 60+ and those with mobility needs.

Has mobility needs	42
No mobility needs	110

Age 18-24	5
Age 25-60	86
Age 60-80	49
Age 80+	12

Families are less likely to refuse offers than all adult and single adult households. Households are twice as likely to be headed by a female.

All Adult	53
Couple with children	21
Lone Female Parent	13
Lone Male Parent	1
Single Female	32
Single Male	32

- c. Band D will be removed (Band D contains households who have applied for social housing but are in no identified housing need)

There is an over representation of Black and minority ethnic applicants in Band D compared to the overall proportion in the borough, but it is less so than in the higher priority groups. There is an over representation of female headed households but again less so than in the higher priority groups, and the majority are households consisting only of adults. The proportion of older applicants is slightly higher than the general population, although it should be noted that once people join Band D there is no mechanism for them to leave and the profile is aging over time.

Black	5126
Asian	408
Mixed	560
Other	1020
Not recorded	355
White	3307

Female	6,164
Male	4,593

All adult	2,227
-----------	-------

Couple with children	1,084
Lone female parent	776
Lone male parent	112
Single Female	3,178
Single Male	3,399

18-24	1,000
25-60	8,116
61-80	1,383
80+	241

d. Waiting time to be from time in Band rather than time of initial application.

The system does not currently report time in Band, it lists from time of initial application. Vulnerable people, including those with English as a second language or those who are digitally excluded, are less likely to understand how the scheme works and have made an early application, so arguably the current arrangement disadvantages them.

The scheme as it currently operates can be very unfair. To give a notional case study as an example:

CASE STUDY

Frank joined the housing register in 2010 when he was 18 years old but had no housing needs – he was living with his mum, had his own bedroom and had not been asked to leave. He was awarded Band D.

Natasha joined the housing register in 2015 as she was severely overcrowded in her private rented tenancy – she was living in a studio flat with her 3 children. She was awarded Band B.

In 2023, Frank updated his housing register application to say that he, his new partner and her 3 children have recently moved into a studio flat. His application was moved up to Band B as they are severely overcrowded.

Under Lambeth’s current policy, Frank will receive a permanent offer before Natasha because he joined the register earlier. This is despite the fact that Natasha has been in housing need for a longer period of time.

e. Applicants will be required to log in annually to keep their accounts active

There has not been a requirement to log in each year, while we can look at look who has placed a bid this is not necessarily an accurate predictor of what will happen in the future.

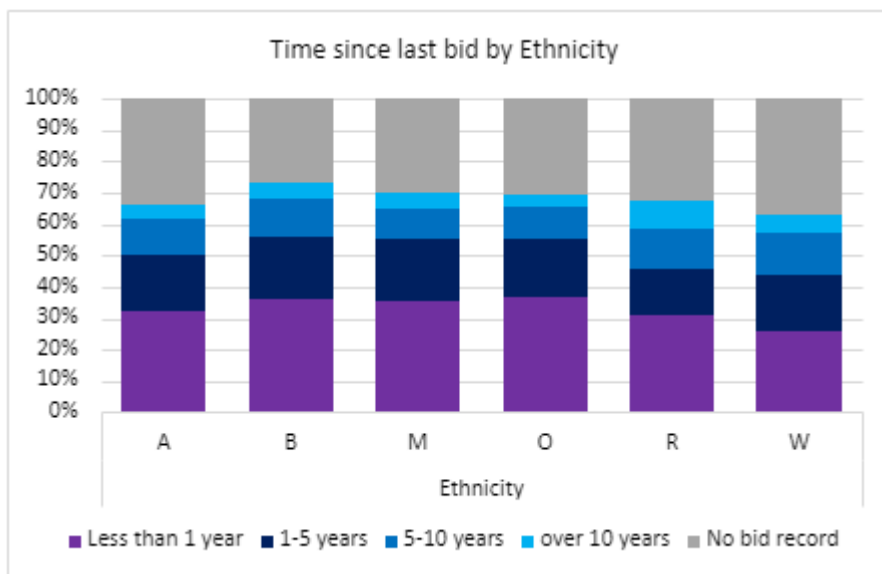
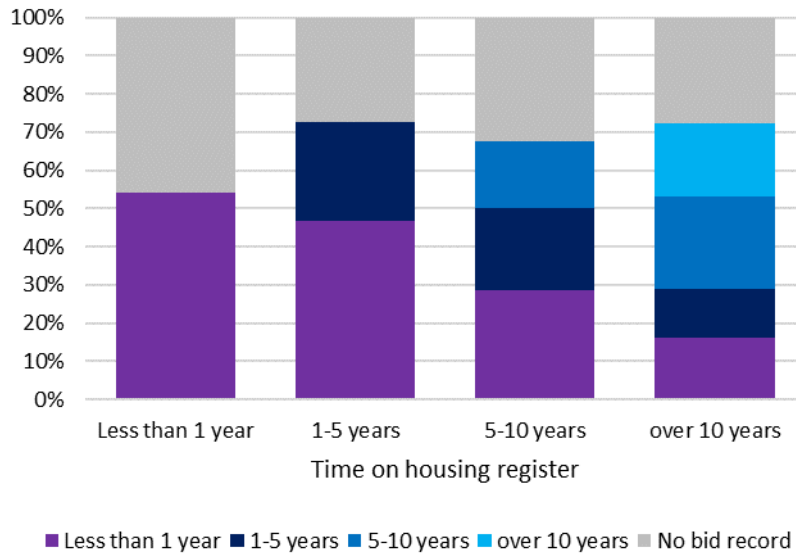
Just a third of people on the housing register (April 2023) had made a bid in the preceding 12 months.

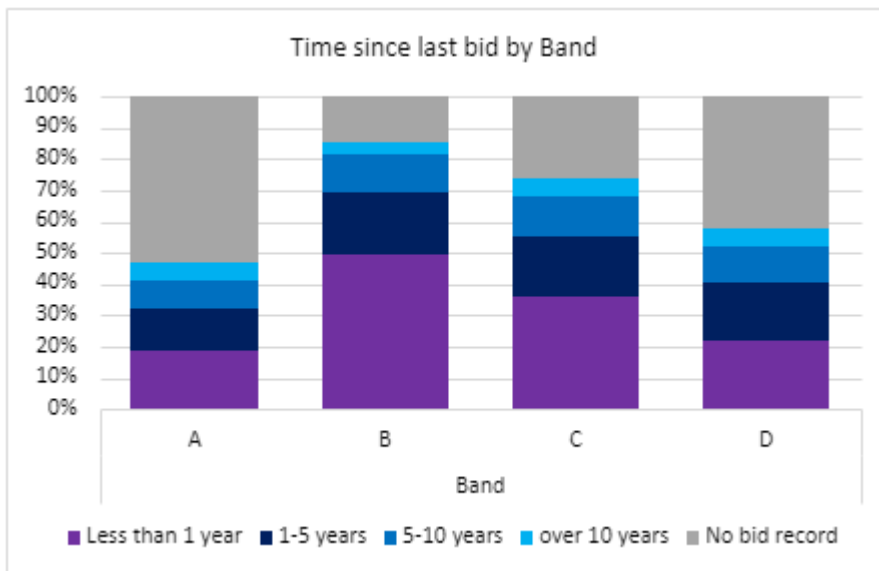
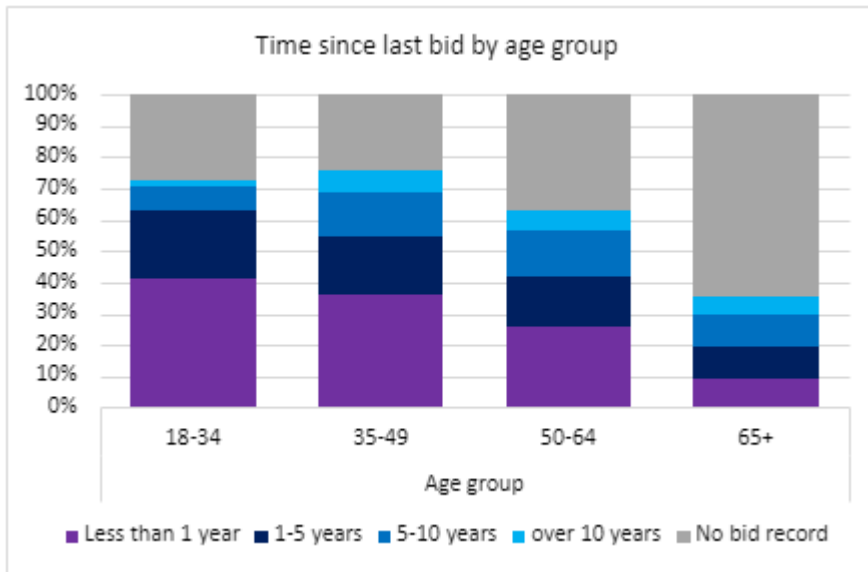
A main predictor on whether someone has bid within the previous 12 months is how long they have been on the housing register. Recent applicants are over three times more likely to have bid than someone who has been on the register for 10 years and over.

White households are a bit less likely to bid than other applicants, and older people are less likely to bid than younger people. One group particularly unlikely to bid on an annual basis

are under-occupiers, with just 10% having bid within the last 12 months. Those most likely to have bid recently are in Band B.

Time since last bid (data at April 2023) by time since registration





All data in recent bid graphs taken from April 2023

Q2b. How will they be impacted by the change

Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
Age	<p>Households in Temporary Accommodation to move from Band C1 to Band B</p> <p>As priority for housing is generally through having dependent children, younger households are over represented in temporary accommodation. The profile of TA and Band B occupants is similar although there are more younger TA occupants (under 24) than in Band B and fewer older occupants.</p>	Neutral

	<p>Offers are limited to one for homeless households and two for other households</p> <p>This is a new policy so the impact will need to be monitored. Older people have been more likely to refuse an offer and may be more affected by this change, although under occupiers are excluded from this. A more efficient allocation scheme where people are more circumspect on the homes they bid on and with fewer requirements to re-advertise homes with be positive for all groups. A concern raised in the consultation was around people being forced into inappropriate accommodation. Any applicant refusing an offer on reasonable grounds that it is unsuitable would not have that counted against them.</p> <p>Band D will be removed</p> <p>Band D applicants cannot successfully bid on properties now, has no impact on their housing situation.</p> <p>Waiting time to be from time in Band rather than time of initial application.</p> <p>Operating the scheme in a fair way should be positive for all equality groups</p> <p>Applicants will be required to log in annually to keep their accounts active</p> <p>Older people may be less confident with technology and disproportionately affected by this change.</p>	<p>Neutral / positive</p> <p>Neutral</p> <p>Positive</p> <p>Negative</p>
<p>Disability + Health Status</p>	<p>Households in Temporary Accommodation to move from Band C1 to Band B</p> <p>The proportion of applicants in TA with a disability is similar to the level in the wider population.</p> <p>There will be fewer lets to Band B households which includes those with a medical need although it should be noted that households which have been identified by the medical advisor as requiring wheelchair / adapted / level access housing will be less affected by this as TA has only 3% of households assessed as such compared to 19% of Band B.</p> <p>Offers are limited to one for homeless households and two for other households</p> <p>This is a new policy so the impact will need to be monitored. A more efficient allocation scheme where people are more circumspect on the homes they bid on and with fewer requirements to re-advertise homes with be positive for all groups. Any applicant refusing an offer on reasonable grounds that it is unsuitable would not have that counted against them.</p> <p>Band D will be removed</p>	<p><i>Neutral / Negative</i></p> <p>Neutral</p> <p>Neutral</p>

	<p>A person will be awarded Band D if they have an illness or disability where rehousing might improve the quality of life of the person, but where the living conditions are not considered significantly detrimental to their health or functional ability. Band D applicants cannot successfully bid on properties now, has no impact on their housing situation.</p> <p>Waiting time to be from time in Band rather than time of initial application.</p> <p>Operating the scheme in a fair way should be positive for all groups. Vulnerable people are less likely to have the ability or knowledge to make an early application and potentially have a disadvantage removed from this change</p> <p>Applicants will be required to log in annually to keep their accounts active</p> <p>Individuals with a medical need will be exempt from this requirement.</p>	<p>Positive</p> <p>Neutral</p>
Gender reassignment	<p>For all the proposals</p> <p>There is very limited data on this. There is no reason to think that this policy would have any negative disproportionate effect on gender reassignment</p>	<i>Neutral</i>
Marriage and Civil Partnership	<p>For all the proposals</p> <p>We do not record information on marital status, there is no reason to think that these proposals would have any negative impact on marriage / civil partnership.</p>	<i>Neutral</i>
Pregnancy and maternity	<p>Households in Temporary Accommodation to move from Band C1 to Band B</p> <p>There's a change in prioritisation between TA and Band B but zero sum change overall with the same number of properties going to families</p> <p>All the other proposals</p> <p>No specific impact.</p>	<i>Neutral</i>
Race	<p>Households in Temporary Accommodation to move from Band C1 to Band B</p> <p>A disproportionate majority of TA applicants are from a Black background. The racial profile of TA and Band B is similar,</p>	<i>Neutral / Positive</i>

	<p>with slightly more Black and Minority Ethnic applicants in TA compared to Band B.</p> <p>Band D will be removed</p> <p>Band D applicants cannot successfully bid on properties now, has no impact on their housing situation.</p> <p>Offers are limited to one for homeless households and two for other households</p> <p>This is a new policy so the impact will need to be monitored. A more efficient allocation scheme where people are more circumspect on the homes they bid on and with fewer requirements to re-advertise homes with be positive for all groups.</p> <p>Waiting time to be from time in Band rather than time of initial application.</p> <p>Making the system fairer should have a positive impact on all groups.</p> <p>Applicants will be required to log in annually to keep their accounts active</p> <p>No particular impact by race</p>	<p>Neutral</p> <p>Neutral / Positive</p> <p>Positive</p> <p>Neutral</p>
Religion/belief (including non-belief)	<p>For all the proposals</p> <p>There is very limited data on this. There is no reason to think that this policy would have any negative disproportionate effect on religion or belief.</p>	<p><i>Neutral</i></p>
Sex	<p>Households in Temporary Accommodation to move from Band C1 to Band B</p> <p>As priority for housing is generally through having dependent children, women are over represented in TA.</p> <p>Offers are limited to one for homeless households and two for other households</p> <p>Women are more likely to receive housing offers.</p> <p>Offers are limited to one for homeless households and two for other households</p> <p>This is a new policy so the impact will need to be monitored. A more efficient allocation scheme where people are more circumspect on the homes they bid on and with fewer requirements to re-advertise homes with be positive for all groups.</p>	<p><i>Positive</i></p> <p>Neutral</p> <p>Neutral</p>

	<p>Band D will be removed</p> <p>Band D applicants cannot successfully bid on properties now, has no impact on their housing situation.</p> <p>Waiting time to be from time in Band rather than time of initial application.</p> <p>Operating the scheme in a fair way should be positive for all equality groups</p> <p>Applicants will be required to log in annually to keep their accounts active</p> <p>Women are more likely to be housing register applicants.</p>	<p>Neutral</p> <p>Positive</p> <p>Neutral</p>
Sexual Orientation	None. We do not collect data on sexual orientation, there is no reason any of the proposals would have any particular disadvantage on sexual orientation..	<i>Neutral</i>
Socio-economic classification	Over 80% of TA households are in receipt of household benefit, as are two thirds of those in social housing.	<i>Neutral</i>
English as an Additional Language	<p>Housing do not keep records on language but we know across the borough that 3.7% of Lambeth residents can not speak English well or at all which is likely to be higher for those accessing social housing.</p> <p>The risk is that it may be harder for people with English as a second language to navigate and be aware of the changes.</p>	<i>Negative</i>
Care experience	<p>Households in Temporary Accommodation to move from Band C1 to Band B</p> <p>Care leavers have Band A bidding status and are unaffected by this change.</p> <p>Offers are limited to one for homeless households and two for other households</p> <p>This would not be enforced for care leavers.</p> <p>Offers are limited to one for homeless households and two for other households</p> <p>This would not apply for care leavers.</p> <p>Band D will be removed</p> <p>Care leavers are in Band A and unaffected by this change.</p> <p>Waiting time to be from time in Band rather than time of initial application.</p>	<i>All neutral</i>

	<p>Care leavers are placed in Band A initially and are unaffected by this change.</p> <p>Applicants will be required to log in annually to keep their accounts active</p> <p>Care leavers would not be subject to this requirement.</p>	
--	--	--

Q3a. How do you plan to promote and deliver any positive impacts of the proposal?

We are planning a phase approach to the delivery of the changes and associated comms over the next 12 months.

Q3b How do you plan to address and mitigate any negative impacts of the proposal?

The EIA process has identified a number of groups which are being excluded from all the changes (see 1a).

We intend to have a comprehensive communication plan so that everyone is aware of the changes, including providing information in different languages.

The process for confirming details on an annual basis is to be made as easy as possible.

The project will be tracked with EDI analysis carried out at each stage to see if there are any disproportionate affects on different groups, and if there are how these can be mitigated.

- We will assess the impact to Band B lets (overcrowding and medical needs) and if necessary can restrict access so that more of these households can bid successfully.
- We will see if different diversity groups are disproportionately refusing offers or failing to log in annually.

We will work with third parties such as the CAB and community groups to help support residents with their awareness of the changes and bidding support where applicable. We will also look to add more bidding support from teams within the council.

Any unsuitable offer – for reasons including not meeting the medical needs of households, would not count as an offer.

There will be a special project looking to encourage older people to downsize. This has the added benefit of making best use of the homes we have available and reducing overcrowding.

Q4. How will you review/evaluate your proposal, mitigating actions and/or benefits? Who will be responsible for this?

We will monitor allocations proactively over the next 24 months seeing how things change. This work will be carried out by the Housing Information Analyst / Allocations Manager and overseen by the AD Housing Needs.

Section to be completed by Sponsor/Director/Head of Service

Outcome of equality impact assessment

- X No adverse impact, no change required
- Low adverse impact, minor adjustment required
- Significant adverse impact, further action required
- Significant impact identified unable to mitigate fully
- Unlawful in/direct discrimination, stop and rethink

Comments from Sponsor/Director/Head of Service

As per assessment

Submit for approval:

Executive Approval: