

# **WATFORD BOROUGH COUNCIL NOMINATION POLICY**

## **REVIEW: EQUALITY IMPACT ANALYSIS**

### **1. Introduction**

This report presents the findings of an assessment of the potential impacts of revisions to the council's Housing Nomination Policy.

In line with most local authorities, Watford Borough Council has undertaken a review of the Housing Nomination Policy in order to respond to changes in legislation and current pressures on the housing stock across all tenures.

The Nomination Policy determines who can join the register for social housing in Watford and the criteria against which housing applications will be assessed and prioritised. The Policy also determines the framework for officer decisions regarding management of the housing register including circumstances in which applications will be suspended or discontinued.

It is important to note that irrespective of local decisions concerning the Housing Nomination Policy, the council will retain its statutory homelessness duties to client groups for whom accommodation will need to be sourced either in the social housing or private rented sectors. The Housing Nomination Policy is only part of a wider range of functions which work to enable people to retain their existing accommodation and access different housing solutions across a variety of tenures e.g. low cost home ownership, private rented housing.

The proposed changes to the Nomination Policy are summarised at

#### **Appendix A.**

### **2. Report methodology**

The methodology used is based on guidance published by Watford Borough Council. In line with this guidance, this report will assess the positive and negative impact of the proposals included within the proposed amendment to the Nominations Policy in respect of the "protected characteristics" set out in the Equality Act 2010. These are:

- Age
- Disability
- Gender reassignment
- Pregnancy and maternity
- Race
- Religion and belief
- Sex (gender)
- Sexual orientation
- Marriage and civil partnership

The assessment considers the impact of the Nominations Policy Review in order to:

- Identify the needs of equality groups
- Identify the positive impacts of the proposed policy change
- Identify the adverse impacts of the proposed policy change
- Identify whether the impacts are justified and/or whether there are proportionate and reasonable mitigation measures that need to be incorporated into the policy

This will be established by:

- Reference to the relevant legislation, regulations and guidance
- Analysis of available data
- Consultation with stakeholders, individuals and organisations.

It is acknowledged that in some areas of this analysis, the amount of data available is relatively low. In some cases, applicants have declined to provide personal information. In other cases, the council's housing application form may not have asked questions historically which would be necessary to establish whether or not a new criteria would apply. For example it is proposed that residency connection will be tightened to 5 out of the last 6 years and there was broad support for this action in the recent housing register survey.

Once proposals are approved, it will be possible to action a re-registration process and amendments to software so that the correct data is available and the outcome of the Policy changes can be monitored going forward.

Until such time, the council can only use the best data available to assess likely impacts and numbers and profiles of those who may be removed from the register.

### **3. Local and National policies**

A variety of national legislation underpins the requirement and need to carry out an equality impact assessment for the proposed policy change. This legislation highlights how equality is increasingly recognised as a fundamental part of the policy-making process, while also requiring organisations to adopt a more proactive approach to promoting equality of opportunity across a variety of projects including those to the built environment.

Consultation and this Equalities Impact Assessment are required stages of the process to ensure Watford Borough Council meets its duties under The Equality Act 2010.

These are particularly important in the case of changes to the Housing Nomination Policy which will impact on those with protected characteristics.

## 4. Project background and description

There are currently 4963 households on the WBC housing register. During the past 3 calendar years there have been an average of 395 lettings to social housing per year.

The imbalance between demand and supply means that the majority of clients on the Housing Register will not be rehoused into social housing, irrespective of whether the council changes its existing Policy to the new proposals or not.

This should be noted when assessing the impact of proposals such as the removal of Band E (those considered to be adequately housed) as very few would come to the top of a shortlist for a property in any case, unless sheltered housing was their preferred option. To a certain extent, impacts on a client group who would not have been rehoused in any case are notional rather than materially affecting the outcome of their application.

As demand by far outstrips the supply of social housing, it is imperative that the council keeps the Nomination Policy under review to ensure that appropriate priority is awarded to housing applicants according to their circumstances, while ensuring that the scheme is practical to manage in administrative terms.

Since the previous Policy was drafted, changes to legislation have been introduced which further strengthen the case for revision.

Under the Localism Act 2011, local authorities are no longer under a duty to retain an “open” housing register and can set local criteria concerning who will qualify to join. It is now possible for authorities to discharge their homelessness duty into the private rented sector without the consent of the applicant.

There have been minor amendments to the “reasonable preference” criteria which local authorities have to take into consideration when awarding relative priority on the housing register.

Reasonable preference must still be given to:

- People who are homeless within the meaning of Part 7 of the Housing Act 1996
- People who are owed a duty by any housing authority ... or who are occupying accommodation secured by any housing authority (under certain sections of the Housing Act 1996 or 1995)
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- People who need to move on medical or welfare grounds, including grounds relating to a disability and

- People who need to move to a particular locality in the district of the housing authority, where failure to meet that need would cause hardship (to themselves or others)

Statutory regulations have been introduced concerning housing applications from the Armed Forces which need to be taken into account. These mean that for certain categories of client the local connection restrictions do not apply and additional preference must be given where there are urgent housing needs. The impacts of Welfare Reform on bedroom entitlement also need to be considered.

## **5. Consultation Methods and Headline Findings**

A questionnaire on the key issues has been made available to housing applicants, the citizens panel and key stakeholder organisations including registered providers and the voluntary sector. Elected members have also been consulted through the Housing Policy Advisory Group and through questionnaires. 490 responses were received online or through the post to the public survey and 16 applicants attended focus groups.

### **Respondents to survey**

- Male 49%, Female 51%
- Health problem/disability 23% (Census 13.6%)
- 25-34 year olds were over represented compared to the Census, as were over 45s. 16-24s were under represented.
- In general, BME respondents were under represented. 83% of respondents were White English, Welsh, Scottish, Northern Irish, British compared to Census figures of 62%.
- The under representation was particularly notable amongst people from an Asian background. Those with no religion were over represented and those of a Muslim faith were under represented.

### **Headline findings**

- Strong support for priority to people with a Watford connection although divided over whether this would be residency or work related also
- Support for excluding people who are adequately housed although caution about what this definition included
- Support for excluding people who could afford to meet their own housing needs, again with caution about what this definition included
- Support for older people to be able to join the register but particularly where freeing up another social home (transfers) or where they have a Watford connection
- Support for suspending applications where there are arrears, damage or non bidding.
- Further consultation in Summer 2014 after further development of the proposals demonstrated general support for the changes from the 146 people involved. Full summary report is available in Appendix C

## 6. Impact Assessments

<b>AGE</b>		
<b>Issue</b>	<b>Impact</b>	<b>Comment including mitigating measures</b>
<b>Under 25s</b>	<b>Positive</b>	
	Exception to residency connection made for care leavers and people placed out of area by a statutory agency	In recognition of the unique situation where clients would retain residency except for the location of their statutory placement.
	<b>Negative</b>	
	Tighter residency connection harder to achieve for younger people	High demand from clients with a local residency connection. Tightening of other local authority criteria will increase demands on Watford.
	Tighter criteria for overcrowding – singles/couples not assessed as needing sole use of living room	Demand for housing makes tight prioritisation necessary. Most commonly found in people living with family/friends who may have the opportunity to save towards alternative housing options.
Reduced banding for households accepted as statutorily homeless, who tend to be younger.	Demand for housing, necessity of encouraging private sector lettings as a homelessness prevention measure, potentially releasing units for other client groups and encouraging planned pathways to housing.	
<b>26 – 59</b>	<b>Negative</b>	
	May be more likely to be in work than older people – local connection through work being removed	Only 37% of lettings to WCHT in 2012/13 were working.

<b>Over 60s</b>	<b>Positive</b>	
	Can remain on the register for older persons accommodation, even if adequately housed (Band E)	
	Can remain on the housing register if they are an existing tenant	
	Retain ability to assess for an additional bedroom on health grounds	
	Tighter local connection more easily achieved by older people	
	<b>Negative</b>	
	Limited to older person's accommodation if Band E	Advantage over other age groups who would not be able to remain on the register (unless a tenant). Band E tend to be rehoused in sheltered accommodation under current policy in any case.

<b>DISABILITY</b>		
<b>Issue</b>	<b>Impact</b>	<b>Comment including mitigating measures</b>
<b>Disabled clients</b>	Not easy to assess impact due to incomplete data.	It is recognised by the council that insufficient data is held on disability. The aim would be to improve data capture on re-registration when Policy changes are introduced.
	<b>Positive</b>	
	Transfers and applicants for older person households in Band E retained – moving for support/facilities within Watford	
	Underoccupiers remain high priority	

	Retain assessment for medical issues including ability to access the register if private sector property would be unsuitable (for homeless cases)	
	Retain ability to assess for an additional bedroom	
	Retain statutory duty regarding disabled facilities grants, including for registered provider tenants	
	Introduce additional bedroom for same sex siblings where one is over 16 and 7 year age gap. This can assist with managing disabilities.	
	<b>Negative</b>	
	Removing local connection due to relatives in Watford – harder to move into the area for support.	No – one was rehoused into a WCHT property on these grounds in 2013/14 Source: Core Data

#### GENDER REASSIGNMENT

Issue	Impact	Comment including mitigating measures
May have clients who are undergoing/have undergone gender reassignment	Difficult to assess the numbers likely to be impacted due to lack of data.	It is recognised by the council that insufficient data is held on gender reassignment.
	<b>Positive</b>	
	Retain ability to assess applications on welfare and medical grounds	

#### PREGNANCY AND MATERNITY

Issue	Impact	Comment including mitigating measures
Pregnant clients and those with young children	<b>Positive</b>	
	Introduce additional bedroom for same sex	

	siblings where one is over 16 and 7 year age gap. Addresses an issue where a second family is started for example.	
	Retain priority for underoccupiers to move, freeing up family sized accommodation for this client group	
	Retain ability for transfers due to overcrowding although unborn children not counted.	
	Increasing time limit on bidding for homeless families	
	<b>Negative</b>	
	Unborn children not counted towards bedroom entitlement	Mitigation – Housing Benefit is not payable for a bedroom for unborn children.  Demand from children who have already been born.

<b>RACE</b>		
	<b>Impact</b>	<b>Comment including mitigating measures</b>
Housing register is ethnically diverse.	<b>Negative</b>	
	Tighter residency connection harder to achieve if new to the area.	Pressure for housing from those already resident in Watford who are a diverse community. Residency connection equally applies to White British residents.
	Overcrowding test is harder (people living with parents who do not have children no longer assessed as needing a living room)	Demand for housing necessitates tighter prioritisation.



<b>RELIGION AND BELIEF</b>		
<b>Issue</b>	<b>Impact</b>	<b>Comment including mitigating measures</b>
	<b>Negative</b>	
	Tighter local connection may be more difficult to achieve if residents have moved to Watford more recently. This may be aligned with religious belief.	

<b>SEX (GENDER)</b>		
<b>Issue</b>	<b>Impact</b>	<b>Comment including mitigating measures</b>
	<b>Positive</b>	
	Introduce additional bedroom for same sex siblings where one is over 16 and 7 year age gap. Previously same sex siblings would be expected to share. There will be an exception to residency connection for applicants who have been accepted on the grounds of domestic violence.	This will relieve pressure on 2 bedroom properties which are in highest demand.
	<b>Negative</b>	
	Statutory homeless banding reduction (tend to be female head of household)	This banding change will enable greater parity between those who are overcrowded in the parental home and those who lose their accommodation for example.

<b>SEXUAL ORIENTATION</b>		
<b>Issue</b>	<b>Impact</b>	<b>Comment including mitigating measures</b>
	Lack of data on this issue as clients may decline to provide.	Re-registration will include data capture to improve monitoring
	<b>Positive</b>	
	Medical/welfare assessments retained	

<b>MARRIAGE AND CIVIL PARTNERSHIP</b>		
<b>Issue</b>	<b>Impact</b>	<b>Comment including mitigating measures</b>
	<b>Positive</b>	
	Marital status irrelevant to banding or bedroom entitlement unless exception made on medical/welfare grounds for additional bedroom	

## **7. Conclusion**

Most applicants on the Housing Register will not be rehoused each year due to the fact that demand far outstrips the supply of housing. For many of those excluded from the register by the proposed Policy changes, the impact is therefore theoretical rather than having an actual impact on their housing situation. This is particularly the case for those in Band E.

In many cases, the revised Policy will continue to give priority for a range of factors experienced by those with protected characteristics. The Policy does include some exceptions to general exclusions from the Housing Register which will also be beneficial to these groups, as summarised above.

For those who are accepted as homeless but do not have a longstanding residency connection with Watford, there will remain the offer of a private sector tenancy which must meet criteria relating to location and quality standards in order to be acceptable under the legislation.

The council's intention is to engage with those on the housing register at present and those seeking to register in the future to give information on alternative housing options and how these can best be accessed. The council will also continue its work to engage with private sector landlords and those agencies offering accommodation, support and access to financial assistance in order to expand the housing options of those who will not be allocated social housing.

In conclusion, in a borough where there is acute pressure for housing and the social housing supply is anticipated to decrease over time, it is felt that tightening of criteria for accessing the council's Housing Register and refining how priority is assessed is justified in order to make best use of the small amount of stock which does become available each year.

Advice and assistance will remain a core part of the Housing Service's business, whether or not clients can access the Register for social housing and there will be extensive communication around the Policy change and alternative options for those who are adversely impacted.

Annual monitoring of the housing register and lettings will continue in order to track the impact of the Policy so that subsequent reviews can be undertaken if outcomes are experienced which cannot be mitigated or justified.

## Appendix A

### Proposed changes to the Nomination Policy

<b>WATFORD BOROUGH COUNCIL NOMINATION POLICY PROPOSED CHANGES JUNE 2014</b>	
<b>Proposed change</b>	<b>Background and aims</b>
<p><b>Band E (See section 12)</b></p> <p>Band E applicants will be removed from the register apart from the exceptions below.</p> <p>New applicants who would have been Band E will not be able to register with the exception of:</p> <ul style="list-style-type: none"> <li>• Housing association tenants in Watford or where WBC would have nomination rights to the resulting vacancy</li> <li>• Homeseekers over 60 for designated older persons accommodation only.</li> </ul> <p>An online self assessment tool will indicate whether an applicant should proceed to making a housing application and will signpost to other options as appropriate.</p> <p>We are investigating how to retain information on those attempting to register but subsequently refused for data analysis and communication purposes.</p>	<p>To manage expectations and encourage use of other housing options.</p> <p>To reduce the workload associated with processing applications who will not be housed</p> <p>To retain data on housing aspiration and need</p> <p>To retain ability to communicate e.g. regarding low cost home ownership</p> <p>Currently over 4,000 in band E of whom around 50% have never bid. Only 45 lets to Band E last year of which 33 were to sheltered housing.</p> <p>32% of Band E applicants are currently living outside the borough of Watford.</p> <p>Other Herts Choice Homes partners have dispensed with general needs Band E.</p>
<p><b>Residency connection (See section 12.13 - 12.14 )</b></p> <p>In order to join the housing register applicants must be living in Watford now</p>	<p>In order to manage demand for social housing in Watford while allowing mobility amongst social housing tenants.</p>

<p>and have lived here for 5 out of the last 6 years.</p> <p>This is a tightening from the previous 3 out of the last 5 years or 6 months out of the last 12 months.</p> <p>There will be exceptions including armed forces (statutory requirement) and tenants of housing associations in Watford or where WBC would have nomination rights.</p> <p>Another exception is made for people such as care leavers who have been placed in temporary accommodation outside of the borough although they originate from Watford and people with disabilities to whom the council owes a homelessness duty but where a private sector property could not be adapted.</p>	<p>Other Herts Choice Homes partners have increased local connection to a requirement of 3 – 5 years.</p> <p>Since the tightening of their criteria, significant numbers of their applicants are now applying to Watford.</p>
<p>Deletion of local connection via close relatives or local work.</p> <p>Existing applicants will be removed from the register.</p>	<p>In order to manage demand for social housing in Watford.</p> <p>Some applicants with a connection through work live in neighbouring boroughs such as Dacorum, Harrow, Three Rivers, Hertsmere.</p> <p>Watford has excellent travel connections which enable commuting to work so that it is not necessary to live in the borough in order to work there.</p> <p>There is no capacity to cater for the needs of those living outside the borough who will need to seek alternative housing options or change relocation plans in a different way than relying on social housing in Watford.</p>
<p><b>Overcrowding and bedroom entitlement (see section 12.3 and 13.1)</b></p> <p>Singles/couples without children who have shared access to a living room will be considered adequately housed if they have their own bedroom.</p> <p>Previously assessed as needing sole</p>	<p>Competition for 1 bedroomed accommodation is high. There is now the demand from underoccupiers impacted by spare room subsidy and those who are pregnant.</p> <p>The aim is to prioritise those in the greatest</p>

<p>use of a living room too.</p>	<p>housing need.</p>
<p>Bedroom entitlement is already aligned to housing benefit regulations except for over 16s.</p> <p>Unborn children do not count towards bedroom entitlement.</p> <p>Change proposed to allow own bedroom for same sex siblings where one is over 16 and there is a 7 year age gap.</p>	<p>To ensure households are not placed in a property too large to be covered by housing benefit.</p> <p>To relieve pressure on 2 bed accommodation and allow a better housing solution which is within housing benefit regulations.</p>
<p><b>Priority for statutory homeless (see Appendix A)</b></p> <p>Reducing priority for statutory homeless households from B to C</p> <p>The proposal is to retain Band B assessment for households applying as homeless before the revised Policy implementation date.</p>	<p>In order to prevent homelessness where possible by reducing the inequality between applicants in overcrowded situations sharing with friends/family and those applying as homeless.</p> <p>Less competition for underoccupiers (Band B) so increasing opportunities for chain moves and homelessness prevention where there are spare room subsidy issues.</p> <p>To facilitate discharge of homelessness duty into the private rented sector rather than solely into social housing</p>
<p><b>Priority for POsH nominations</b></p> <p>Reduced from Band B to C in line with statutory homeless households.</p>	<p>In order to remain in line with the banding given to statutory homeless households. If this was not undertaken, those accepted as statutorily homeless would have a lower banding than those nominated by POsH where the council does not have a duty to rehouse.</p>
<p><b>Bidding time limit for statutory homeless (see section 14.3)</b></p> <p>Increase “free choice bidding” time limit from 4 weeks to 8 weeks for statutory homeless households</p>	<p>To reflect the change in banding from B to C and enable some choice while reducing potential for suitability reviews in some cases.</p>

<p><b>Financial hardship</b></p> <p>Removal of financial hardship priority</p>	<p>It is no longer possible to award meaningful priority due to the numbers of households impacted by Welfare Reform and the economic crisis.</p> <p>This criteria was not often used under the former Policy.</p>
<p><b>Insecure Housing</b></p>	<p>Removal of priority for insecure housing which had previously been in place to recognise the situation of people living at home with parents. Discrepancy between homeless households and those overcrowded at home is being addressed in a different way through the banding change of homeless households from B to C.</p>
<p><b>Quotas</b></p> <p>Removal of quotas previously in place as targets for letting to bands D and E</p>	<p>E will largely be discontinued and the reviewed priorities listed above are intended to balance lettings appropriately, alongside local lettings policies and ringfencing for transfers which are already in place.</p>
<p><b>Housing Panel (see section 24)</b></p> <p>Housing Panel replaced by Housing Officers with reviews to be carried out by a more senior officer</p>	<p>The restructure within the Housing Service makes former arrangements where 2 managers form a panel to review complex cases and their decision can in turn be reviewed by a more senior officer unnecessary and unviable.</p>
<p><b>Local lettings plans (see section 14.10)</b></p> <p>May be applied to whole or part of larger schemes</p>	<p>In the case of large developments where units will come on stream at the same time, local lettings policies can have a disproportionate impact on the functioning of the Nomination Policy and limit the opportunities for those in greatest housing need to an unforeseen extent. Including a provision to apply local lettings to parts of schemes where appropriate seeks to address this issue.</p>

<p><b>Refusals of properties</b></p> <p>Provision to remove applicants from the register for 6 months if 3 properties are refused</p>	<p>Last year there were 199 refusals against 395 lettings. These are costly to receiving housing associations and the council in terms of rent loss and staffing and place more pressure on those subsequently offered to move more quickly.</p>
<p><b>Adequate resources</b></p> <p>Homeowners will not qualify for the housing register</p> <p>Trigger for a financial assessment which may find that applicants have sufficient resources to meet their own housing need and therefore not qualify for the register:</p> <ul style="list-style-type: none"> <li>• Household capital or savings of £16,000 or more</li> <li>• Total household net income equal to or greater than four times the Local Housing Allowance (LHA) rental level of a suitable property annually (with the 1 bed LHA rate being used to assess the income of single people including those who are under 35).</li> </ul>	<p>In order to prioritise those in most need of social housing.</p>
<p><b>Worsened circumstances</b></p> <p>Guideline for reviews of cases where banding has been reduced due to a deliberate worsening of circumstances set at 1 year.</p>	<p>In order to be clearer about when cases are likely to be reviewed.</p>

## Appendix B Profiles

### Age

	Borough of Watford	Housing Register	Band E	Lettings 3 calendar years
<b>Total population</b>	90,301	4,963	4,043	1,185
<b>Under 25</b>	31.6%	11.2%	11.8%	20.1%
<b>25-59</b>	51.7%	76.5%	78.4%	63.1%
<b>60+</b>	16.1%	13.3%	9.8%	16.8%

Band E which will largely be removed equates to the housing register profile in terms of these broad age bands and therefore will not have a disproportionate impact when the change is implemented.

Housing register under 25s are a low proportion compared to the borough. Percentage of lettings to this age group are disproportionately high.

### Health and Disability

Directly comparative data is not available on this issue across the borough, housing register and lettings. However, the analysis is as follows:

	Borough of Watford	Housing Register*	Lettings*
<b>Good health</b>	84.9%		
<b>Fairly good/fair health</b>	11.0%		
<b>Not good/bad/very bad health</b>	4.1%		
<b>Disability/ Long term illness – yes</b>	13.7%	1.1%	3.5%
<b>Disability – no</b>		5.2%	33.4%
<b>Disability – not stated</b>		93.9%	91.3%

Complete data records unavailable \*

### Gender reassignment

There is insufficient borough wide or housing specific data available to analyse the profile against gender reassignment.



## Pregnancy

There is insufficient borough wide or housing specific data available to analyse the profile in terms of pregnancy.

## Race

	<b>Borough of Watford</b>	<b>Housing Register</b>	<b>Band E</b>	<b>Lettings 3 calendar years</b>
White British	61.9%	53.2%	55.3%	55.4%
White Irish	2.3%	1.6%	1.6%	2.2%
White Other	7.7%	9.4%	8.1%	7.4%
White & Black Caribbean	1.1%	2.0%	2.2%	1.7%
White & Black African	0.5%	0.9%	0.8%	0.84%
White & Asian	1.0%	0.7%	0.7%	0.51%
Mixed Other	0.8%	1.0%	1.0%	1.18%
Asian Pakistani	6.7%	4.7%	3.9%	6.6%
Asian Bangladeshi	0.4%	0.7%	0.7%	0.34%
Asian Indian	5.5%	1.3%	1.4%	0.68%
Asian Other	4.4%	3.2%	3.0%	3.0%
Black Caribbean	1.5%	2.6%	2.7%	3.0%
Black African	2.1%	7.0%	7.1%	7.1%
Black Other	0.4%	3.2%	3.2%	1.0%
Other	1.2%	1.3%	1.2%	0.68%
Arab	0.2%	0		0.08%
Chinese	0.9%	0.2%	0.2%	0.08%
Not stated	0	6.9%	6.6%	8.3%
Total				1185

## Religion and Belief

The amount of cases where religion is not stated on the Housing Register means that it is not possible to make a direct comparison across these data sets.

	<b>Borough of Watford</b>	<b>Housing Register</b>	<b>Lettings</b>
<b>Christian</b>	54.1%	4.3%	7.5%
<b>Buddhist</b>	0.7%	0.1%	0.1%
<b>Hindu</b>	4.8%	0.2%	0.3%
<b>Jewish</b>	1.1%	0.2%	0.1%
<b>Muslim</b>	9.9%	1.2%	2.0%
<b>Sikh</b>	0.6%	0	0

<b>Other religion</b>	0.5%	0.2%	0.3%
<b>No religion</b>	21.4%	1.3%	3.4%
<b>Religion not stated</b>	6.7%	92.6%	61.0%

### **Gender**

On the housing register and lettings data this relates to lead applicants so a direct comparison across data sets is not possible.

	Borough of Watford	Housing Register	Band E	Lettings
<b>Males</b>	49.6%	44%	44%	37.0%
<b>Females</b>	50.4%	56%	56%	63.0%

### **Sexual orientation**

There is insufficient borough wide or housing specific data available to analyse the profile in terms of pregnancy.

### **Marriage and Civil Partnership**

There is insufficient borough wide or housing specific data available to analyse the profile in terms of pregnancy.

## **Appendix C**

### **1.0 SUMMARY OF HOUSING REGISTER SURVEY**

- 1.1 The housing register survey was carried out in Summer 2014 as part of the Council's review of the existing Housing Nomination Policy. This was the second round of consultation as an earlier, more generalised survey giving options for change was carried out in 2013. The earlier consultation had received 490 responses and 16 attendees had attended focus groups.
- 1.2 The 2014 survey was made available on the Council website and Herts Choice Homes website and was open to all residents of Watford. The questions were drawn to reflect the aspects of the Housing Nomination Policy that were earmarked for changes. Participants were also able to comment on how the existing policy had impacted on them and how the pending amendments would impact on them subsequently.
- 1.3 This report provides an overview of the individual questions and the responses generated. The responses were analysed and the deductions interpreted broadly in line with the intended amendments.
- 1.4 There were 19 questions in all with the respondents being limited to an option of 1 out of 3 possible choice of answers for clarity. Alternatively they could skip any particular question should they be minded. The questions were not vague or general as they do relate to particular aspects of the Housing Nominations Policy.
- 1.5 The total number of respondents was 146. It is noted that this figure is comparatively low referencing the total number of residents in the borough which stands at an excess of 90,000 however it relatively reflects the diversified composition that currently exists within Watford Borough Council area.
- 1.6 The number of respondents also varied on individual questions and it is deduced that individual respondents would most likely respond on questions that have a direct impact on them.

### **2.0 RESULT**

- 2.1 The responses broadly reflect that most are supportive of the proposed amendments and additional comments do show that they would prefer that the restrictions went further demonstrating the high demand for housing in Watford

2.2 Some respondents sought clarity on certain questions which the proposed amendments has already addressed

2.3 The questions and responses are expressed in percentages and with interpretation

## **Appendix**

Appendix A: Outline implementation plan

### 3.0 SURVEY QUESTIONS, RESPONSES & INTERPRETATION

**Q1.** *To join, or stay on Watford's Housing Register, people should : Live in Watford now and have done so for at least 5 out of the last 6 years. There Were 144 respondents; 2 skipped.*

Answer Choices	Responses	
I agree	63.89%	92
I disagree	27.08%	39
I don't know	9.03%	13
<b>Total</b>		<b>144</b>

The above reflects a broad support for the proposal that existing and prospective applicants to the Housing Register should have resided in the Watford Borough Council area for 5 out of the last 6 years.

**Q2.** *Working or having relatives in Watford should not count as a 'residency connection'- a connection which makes people eligible to apply. There were 140 respondents; 6 skipped*

Answer Choices	Responses	
I agree	50.71%	71
I disagree	41.43%	58
I don't know	7.86%	11
<b>Total</b>		<b>140</b>

The above reflects that the proportion of support for the proposal to restrict access to the register through work or having relatives in the borough outweighs the opposition to this amendment. This follows through from the previous question on eligibility through residency.

**Q3.** *Remove all the applicants who are in Band E(the lowest priority band who are adequately housed) but allow people over 60 who would like older person's accommodation only to remain on the Housing Register as Band E. There were 129 respondents; 17 skipped.*

Answer Choices	Responses	
I agree	48.84%	63
I disagree	41.86%	54
I don't know	9.30%	12
<b>Total</b>		<b>129</b>

Whilst support is expressed for the above proposal the relative closeness between respondents agreeing and those who disagree reflected in this data despite this being accommodation specifically for the elderly shows the high pressure on the demand for housing in Watford.

**Q4.** *Remove all the applicants who are in Band E (the lowest priority band who are adequately housed) but allow people who are living in a housing association property in Watford or where Watford BC would be able to nominate someone to the vacancy if they moved, to remain on the Housing Register as Band E. There were 128 respondents and 18 skipped.*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	36.72%	47
I disagree	35.16%	45
I don't know	28.13%	36
<b>Total</b>		<b>128</b>

The varying response on the above question is broadly close however the preference for concession on this outweighs the opposition.

**Q5.** *Remove people from who own their own home from the Housing Register. There were 127 respondents; 19 skipped.*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	90.55%	115
I disagree	5.51%	7
I don't know	3.94%	5
<b>Total</b>		<b>127</b>

The response agreeing to the above proposal is extremely high compared with any opposition within the respondent group.

**Q6.** *Remove people who have enough income or capital to buy or rent a home privately. There were 126 respondents, 20 skipped.*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	61.90%	78
I disagree	28.57%	36
I don't know	9.52%	12
<b>Total</b>		<b>126</b>

The above reflects a broad support for the proposal that existing and prospective applicants who have enough income or capital to buy or rent a home privately should be excluded from the register.

**Q7.** *Remove people who refuse 3 properties that they have been offered (with a review period set to reapply). There were 124 respondents; 22 skipped*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	75.81%	94
I disagree	20.16%	25
I don't know	4.03%	5
<b>Total</b>		<b>124</b>

The above reflects a broad support for the proposal that existing applicants who have refused 3 offers of a properties considered to be reasonable and suitable for their needs should be excluded from the register.

**Q8.** *Remove people who have deliberately made their housing situation worse (with a review period set to reapply). There were 125 respondents; 21 skipped*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	77.60%	97
I disagree	13.60%	17
I don't know	8.08%	11
<b>Total</b>		<b>125</b>

The above reflects a broad support for the proposal that existing and prospective applicants who have deliberately made their housing situation worse should be excluded from the register for set period. It is supportive to note that the prospective position of Watford Borough Council to exercise restrictions on cases such as this also has the broad support of the respondents.

**Q9.** *People without children who have their own bedroom but are sharing a living room would no longer be counted as overcrowded. There were 125 respondents; 21 skipped*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	59.20%	74
I disagree	28.80%	36
I don't know	12.00%	15
<b>Total</b>		<b>125</b>

This reflects a broad support for the proposal with respondents in favour more than twice the number in opposition. Another reflection of the increasing demand for housing.

**Q10.** *Families with two same sex children where one is over 16 and there is a 7 year age gap or more would be considered to need separate bedrooms for each child. There were 126 respondents, 20 skipped.*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	76.98%	97
I disagree	14.29%	18
I don't know	8.73%	11
<b>Total</b>		<b>126</b>

The above reflects the broad support of the respondents with majority agreeing to this.

**Q11.** *Due to the shortage of housing association homes, households where the council has a homelessness duty to find alternative accommodation may be offered private sector housing instead of social housing. There were 124 respondents; 22 skipped.*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	60.48%	75
I disagree	27.42%	34
I don't know	12.10%	15
<b>Total</b>		<b>124</b>

The above reflects a broad support in the council's bid to rehouse homeless households into accommodation in the private sector. As part of the Housing Nominations Policy, a Private Sector Discharge Policy will come into operation to set out the process for this policy.

**Q12.** *Households where the council has a homelessness duty to find alternative accommodation will be offered private sector housing if they cannot join the Housing Register e.g. are not living in Watford now and for 5 out of the last 6 years (for those applying after the new Policy comes in). There were 121 respondents; 25 skipped.*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	59.50%	72
I disagree	20.66%	25
I don't know	19.83%	24
<b>Total</b>		<b>121</b>

This follows through from the previous question further subscribing to a broad support in the council's proposal to rehouse homeless households into accommodation in the private sector.



**Q13.** *Homeless households would be able to bid for an increased time limit of 8 weeks before the council bids for properties for them on Choice Based Lettings. There were 122 respondents; 24 skipped.*

<b>Answer Choices</b>	<b>Responses</b>	
I agree	63.11%	77
I disagree	21.31%	26
I don't know	15.57%	19
<b>Total</b>		<b>122</b>

The above reflects a broad support from the respondents for the proposal with the majority in agreement.

**Q14.** *If you have any further comments on the Housing Register or the Housing Nomination Policy, please share your views below. There were 30 respondents; 116 skipped.*

In summary, the comments were broadly in support of the proposed amendments to the Housing Nomination Policy. There were additional suggestions which include

- Preference for resident working families above non-working families
- Reserving a percentage of properties for eligible working residents
- Further assistance to secure properties in the private rent sector.
- Further restrictions on homeless households to discourage homelessness being used as a quicker route into social housing
- Need to make larger family homes available within the borough
- Process to address under-occupation in social housing properties
- Prioritisation for applicants with more than 6 years waiting time

**Q15.** *Are you? There were 112 respondents; 34 skipped*

<b>Answer Choices</b>	<b>Responses</b>	
Male	30.36%	34
Female	69.64%	78
<b>Total</b>		<b>112</b>

This is gender related and indicates that a higher proportion of the respondents were females compared to the males. This is also a reflection of the current housing register that has more female household members and heads of household than males.

**Q16.** Which age band are you in? There were 117 respondents; 29 skipped

<b>Answer Choices</b>	<b>Responses</b>	
18-19 years	0.85%	1
20-24 years	8.55%	10
25-34 years	36.75%	43
35-44 years	23.93%	28
45-54 years	22.22%	26
55-64 years	5.13%	6
65-74 years	1.71%	2
75-79 years	0.00%	0
80+	0.85%	1
<b>Total</b>		<b>117</b>

The above age bands and the breakdown of the respondents in each band is a reflection of the existing register. As an example, the 25-34 age band represents the highest number of existing applicants on the register. The least number applicants occur from the age 55 and above which is in excess of 750 at present on the register.

**Q17.** Are you working, not working or retired? There were 116 respondents; 30 skipped.

<b>Answer Choices</b>	<b>Responses</b>	
Working	69.83%	81
Not working	27.59%	32
Retired	2.59%	3
<b>Total</b>		<b>116</b>

The working group had the highest number of respondents in this survey. This may explain the suggestions in favour of the working residents in the borough earlier in the survey.

**Q18.** Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last at least 12 months? There were 115 respondents; 31 skipped

<b>Answer Choices</b>	<b>Responses</b>	
Yes, limited a lot	6.96%	8
Yes, limited a little	13.04%	15
No	80.00%	92
<b>Total</b>		<b>115</b>

The composition of the responses is a fair reflection of the current register. There is provision in the policy for applicants with health problems or disability. A limited number of properties with specific disabled facilities are

reserved for eligible applicants and due diligence is observed to ensure that these properties are accessed by those with the identified needs.

**Q19** *To which of these groups do you consider you belong? There were 112 respondents, 34 skipped.*

<b>Answer Choices</b>	<b>Responses</b>	
English/Welsh/Scottish/Northern Irish/ British	62.50%	70
Gypsy or Irish Traveller	1.79%	2
Irish	0.89%	1
Any other white background	6.25%	7
Caribbean	5.36%	6
African	5.36%	6
Any other Black background	1.79%	2
White & Black Caribbean	1.79%	2
White & Black African	0.89%	1
White & Asian	0.89%	1
Any other mixed / multiple ethnic background	1.79%	2
Pakistani	2.68%	3
Bangladeshi	1.79%	2
Chinese	0.00%	0
Any other Asian background	1.79%	2
Arab	2.68%	3
Other ethnic group	0.89%	1
<b>Total</b>		<b>112</b>

This is another reflection of the relative population of the individual groups on the current register and is similar to the records from the most recent census conducted in the borough.

#### **4.0 CONCLUSION**

4.1 The above survey has clearly set out the plan of the Watford Borough Council to make amendments to the current Housing Nomination Policy and the areas where these are intended.

4.2 It is noted that the sample size is marginal, 146 in total from a borough population in excess of 90,000 based on the recent census of 2011. However further analysis of the characteristics of the sample as shown in the questions establishes the sample size as an effective representation of the composition of the current register and the borough as a whole.

4.3 It should also be noted that effective representative surveys average a sample size of 0.005% of the total population. The above survey represents 0.001% which falls within an acceptable statistical margin considering the current the population of Watford.

- 4.4 The responses generated have emphasised the need for Watford Borough Council to make urgent changes in the way the Housing Register operates its service.
- 4.5 While it is acknowledged that the changes will raise the eligibility requirement and inevitably reduce the number of applicants on the register, the reduction in number will make way for the delivery of a service that is more representative, relevant, effective and efficient.
- 4.6 There was broad mention and corresponding acceptance that access on to the register should be restricted and made more favourable to the residents of the borough that meet the eligibility criteria.
- 4.7 There was mention of further provision for working residents rather than the non-working residents in the borough that has not being taken forward by the council and an emphasis on active steps that should be taken to discourage reliance on the homelessness as a quicker route into social housing which is very much the focus of the Policy.
- 4.8 The above establishes a broad support for the proposed amendments.

## APPENDIX A

Following the broad support expressed in the consultation survey, a prospective outline of the implementation plan is as below. The start and end dates are estimates as defined and may be subject to change in the course of implementation.

### Outline implementation plan

Task	Estimated Start Date	Estimated End Date	Priority	Notes
<ul style="list-style-type: none"> <li>• Software changes and testing, tailoring an online pre-assessment model which will advise people after a few questions if they are unlikely to be able to register and what their options are.</li> </ul>	<b>Sep-14</b>	<b>Jan-15</b>	<b>High</b>	
<ul style="list-style-type: none"> <li>• Requiring applicants to re-register so that we can assess them against the new criteria. This will require additional support in the CSC.</li> </ul>	<b>Feb-15</b>	<b>Mar-15</b>	<b>High</b>	
<ul style="list-style-type: none"> <li>• Carrying out staff and partner agency training to ensure that applicants are correctly assessed and supported</li> </ul>	<b>Nov-14</b>	<b>Feb-15</b>	<b>High</b>	
<ul style="list-style-type: none"> <li>• Significant public communications work to explain the policy but also to bolster the supply of information on alternative housing options</li> </ul>	<b>Oct-14</b>	<b>Dec-14</b>	<b>High</b>	
<ul style="list-style-type: none"> <li>• Development and approval of our Private Sector Discharge Policy to enable us to meet our homelessness duty to people who can no longer register for social housing (and potentially other homeless cases where suitable private sector property is available).</li> </ul>	<b>Oct-14</b>	<b>Feb-15</b>	<b>High</b>	
<ul style="list-style-type: none"> <li>• Development of supporting procedures in order to implement the Policies and monitoring systems for regular reporting and action as required</li> </ul>	<b>Sep-14</b>	<b>Apr-15</b>	<b>High</b>	
<ul style="list-style-type: none"> <li>• Re-registered applications being held in a pending system until implementation date</li> </ul>	<b>Jan-15</b>	<b>Mar-15</b>	<b>High</b>	