

HARINGEY COUNCIL EQUALITY IMPACT ASSESSMENT FORM: SERVICE DELIVERY

Service:	Community Housing Service
Directorate:	Chief Operating Officer
Title of proposal:	Proposed Changes to the Allocations Scheme
Lead Officer (author of the proposal):	Perry Singh, Head of Housing Needs & Lettings (Interim)
Names of other Officers involved:	Phil Harris Bev Faulkner

Statement of purpose

In making this proposal, we have been mindful of our public sector equality duty to have due regard to the need to:

- a) eliminate discrimination;
- b) advance equality of opportunity between different groups and;
- c) foster good relations between groups in Haringey.

In addition we are committed to ensuring that we promote social inclusion in all council services making sure that they address the needs of those vulnerable residents who rely most heavily on them. The most socially excluded residents predominantly have the protected characteristics defined in the Equality Act 2010.

The purpose of this assessment is to:

- a) Identify whether and to what extent this proposal: could produce disadvantage or enhance opportunity for any groups with the protected characteristic defined in the Equality Act 2010;
- b) Establish whether the potential disadvantage is significant enough to call for special measures to remove or reduce the disadvantage;
- c) Identify and set out the measures that will be taken to remove or reduce the disadvantage;

- d) Where mitigation measures are not possible, to set out and explain why;
- e) To ensure that Members are fully aware of the implications the proposal may have for the Council's public sector equality duty before they decide on the proposal.

Step One: Identify the aims of the proposal

1) Please state:

- What problems the proposal is intended to address
- What effects it is intended to achieve
- Which group(s) it is intended to benefit and how

Background

There is a statutory requirement for local authorities to publish an Allocations Scheme that sets out in detail how households are prioritised for permanent accommodation. The Localism Act 2011 provides Local Authorities with considerable discretion in constructing the scheme. This paper sets out a number of proposals recommended when devising a new allocations scheme for Haringey.

The demand for housing from the Council significantly outstrips out ability to meet it. The Allocations Scheme sets out how the Council will prioritise this limited resource.

Proposals

The report recommendations are set out below, below each recommendation I have indicated a) the policy intent b) groups intended to benefit.

1. Removing Bands D & E

Households placed on the housing register should have a realistic chance of receiving an offer of accommodation. Therefore the existing bands D and E should be deleted.

- a. Since the establishment of the current scheme no households in Band D or E have received an offer of permanent accommodation. The removal of these bands will help to manage expectations, from households that have no realistic prospect of success.
- b. The overall nature of the Allocations Scheme will not change in that that the lettings scheme continues to be largely needs based. Band D and E applicants will suffer no material loss, in that the evidence is that they would have received no benefit from the existing scheme.

2. 3 year residency criteria

Applicants must be resident in the Borough for a minimum of 3 years before they can join the housing register.

- a. The policy aim is to provide housing to those households that have a stronger connection with the Borough. There is already a residency a criterion of a year the proposal is to extend this by a further two years.
- b. As above households that have a stronger connection to the Borough. It is not anticipated that this will negatively impact on households with protected characteristics.

3. Local Lettings Plans

The Allocations Scheme should support the ambitions of the Council in regenerating the Borough. It is recommended that Local Lettings Plans are established to support economic and physical regeneration of particular areas, following appropriate consultation.

- a. The primary aim of this approach is to support the physical regeneration of the borough, which will require the decanting of households. A secondary aim is the application of Local Lettings Plan to assist with the regeneration of wards with very levels of benefit dependency.
- b. All residents should benefit from this.

Note: Each Local Lettings Plan will be subject to separate consultation and an EQIA, prior to agreement at Cabinet Member signing. Therefore this item will not be explored further in this EQIA.

4. Supporting vulnerable single people

Single people who are vulnerable and are being provided with the necessary support to live independently (through Haringey's Pathway Model) will be awarded extra priority for social rented housing if private rented housing is unsuitable or unavailable.

- a. The Pathway Model is specifically designed to provide the right type of support for vulnerable single people to help them to become independent.
- b. Single people deemed to be vulnerable on a number of grounds – disability (physical / mental), being institutionalised, substance misuse etc. Often the person may have multiple problems.

5. Improved assessment for older people's housing

The process for assessing priority to supported accommodation is reviewed, to ensure that a proper balance is struck between housing need and support needs.

- a. Ensure that the assessment process for supported accommodation is more holistic and takes proper account of housing and support needs.
- b. Sheltered accommodation is for older people there will be no change to this, the aim will be to have a more balanced judgement in terms of relative priority.

6. Additional Quotas: Care Leavers with Children and Armed Forces

Additional quotas are provided for Care Leavers with children of their own and for certain households connected to the Armed Forces.

- a. To address gaps in the current provision. Care Leavers with children of their own are treated differently to single Care Leavers. There is a requirement in law to give additional preference to certain people leaving the Armed Forces.
- b. Small additional quotas will be provided for the two groups as identified above.

7. Exceptions Panel

An Exceptional Circumstances Panel is established to consider whether exceptions should be made to the Housing Allocations Scheme on a case by case basis.

- a. It is not possible to anticipate every circumstance and there will be instances where exceptions to policy need to be applied.
- b. Given this will be a case-by-case review, it is unlikely that particular groups will be advantaged or disadvantaged.

Step Two: Consideration of available data, research and information

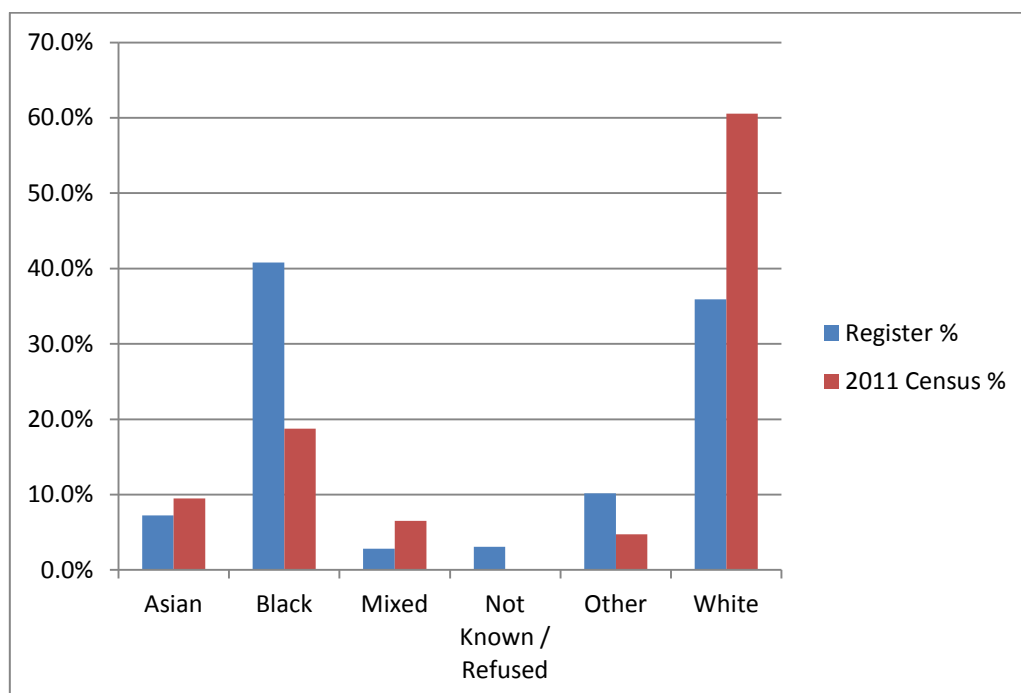
Instruction: You should gather all relevant quantitative and qualitative data that will help you assess whether at present, there are differential outcomes for the different equalities target groups – diverse ethnic groups, women, men, older people, young people, disabled people, gay men, lesbians and transgender people and faith groups, etc. Identify where there are gaps in data and say how you plug these gaps.

In order to establish whether a group is experiencing disproportionate effects, you should relate the data for each group to its population size. The Haringey Borough Profile of Protected Characteristics (can be found on the Website) will help you to make comparisons against Haringey's population size. The most up to date information can be found in the [Joint Strategic Needs Assessment](#).

- 1) Using data from equalities monitoring, recent surveys, research, consultation etc. are there group(s) in the community who:
 - are significantly under/over represented in the use of the service, when compared to their population size?
 - have raised concerns about access to services or quality of services?

Ethnicity

There is a significant difference between the ethnicity of households on the housing register as compared to the general population of the borough.

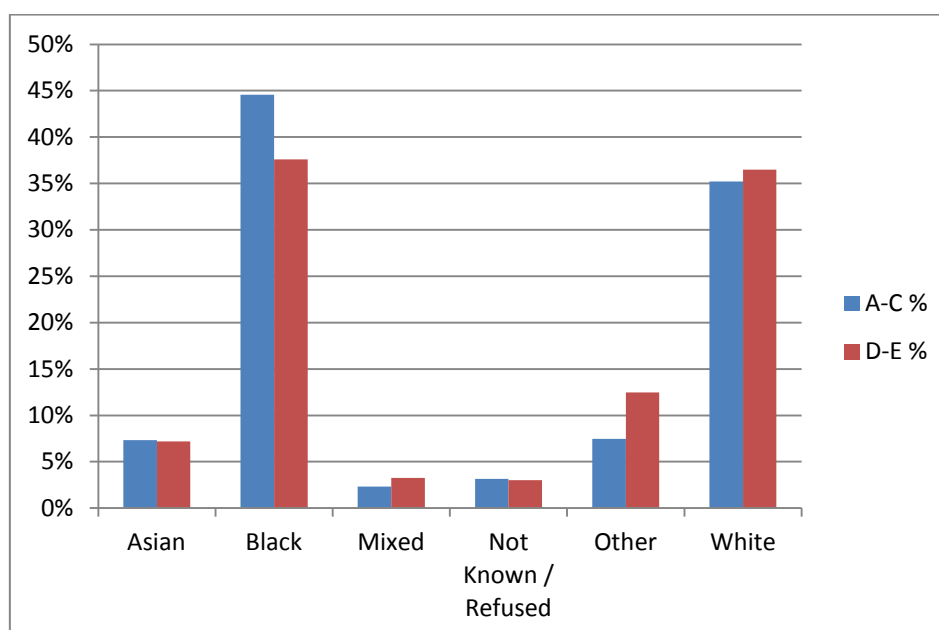


Ethnicity	Register %	2011 Census %	Variation
Asian	7.2%	9.5%	-2.2%
Black	40.8%	18.8%	22.0%
Mixed	2.8%	6.5%	-3.7%
Not Known / Refused	3.1%	0.0%	3.1%
Other	10.2%	4.7%	5.4%
White	35.9%	60.5%	-24.6%

The two very marked variations against the census figures are the reduced proportion of white households and by contrast almost an equivalent increased proportion of black households.

Ethnicity & Banding

In term of considering ethnicity in terms of relative priority within the Allocations Scheme, the chart below shows the relative proportion of the main ethnic groups by bands A-C and bands D-E.



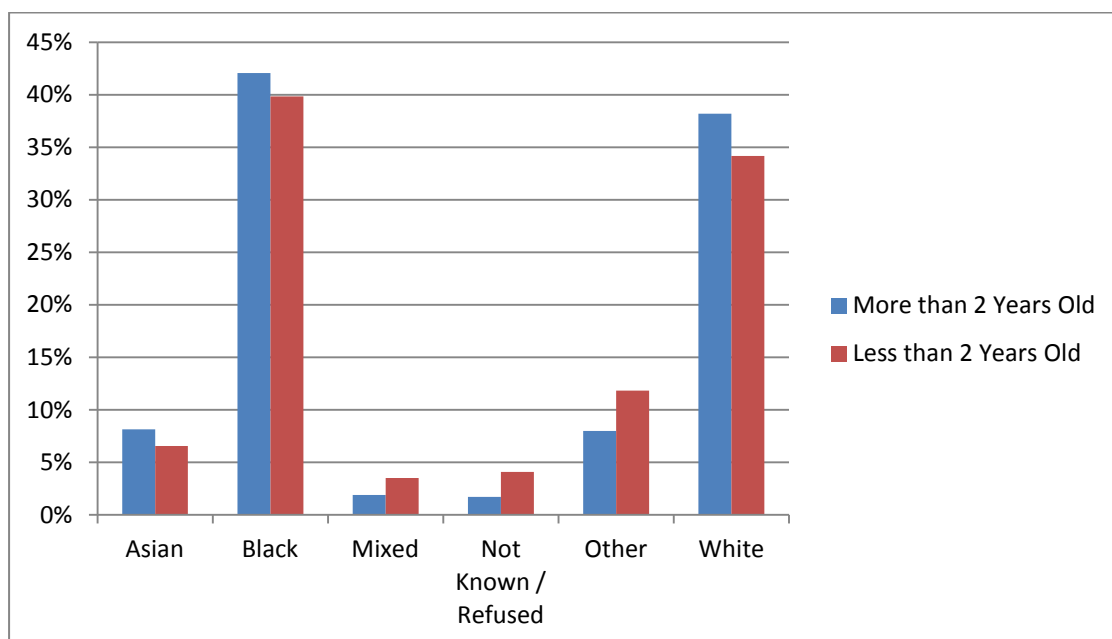
Ethnicity	A-C %	D-E %	Variation
Asian	7%	7%	0%
Black	45%	38%	7%
Mixed	2%	3%	-1%
Not Known / Refused	3%	3%	0%
Other	7%	12%	-5%
White	35%	36%	-1%

The table indicates that the distribution of ethnic groups in higher and lower bands is broadly consistent. The most marked variation is in the over-representation of black households in the higher priority group.

Ethnicity and the Age of the Application

One of the policy intentions is to increase the residency criteria before being allowed to apply to the housing register from one year to three years. The current system does not hold information on residence, we only record the date the application was made – checks would be made that the applicant was resident in the borough and had been so for a year. Applicants may be resident in the Borough for many years before making an application.

The chart below uses the registration date as a proxy, to test whether there may be any perverse outcomes from the policy.

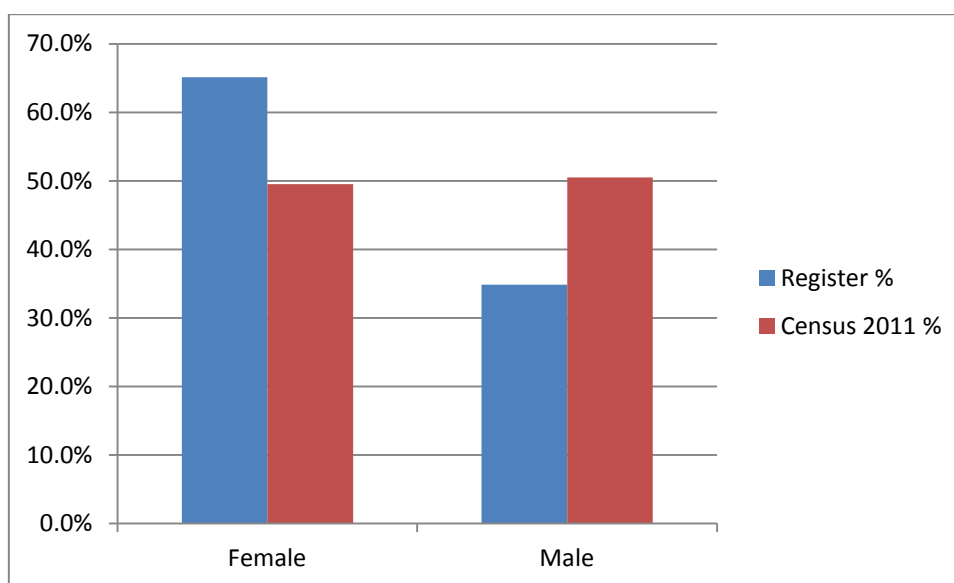


Ethnicity	More than 2 Years Old	Less than 2 Years Old
Asian	8%	7%
Black	42%	40%
Mixed	2%	4%
Not Known / Refused	2%	4%
Other	8%	12%
White	38%	34%

There are variations, but there is a broad consistency between the applications more than 2 years old and applications less than 2 years, with regard to ethnicity.

Sex

There is a significant variation in terms of the census, as the chart below indicates. This analysis is based on the sex of the person given as the main applicant.

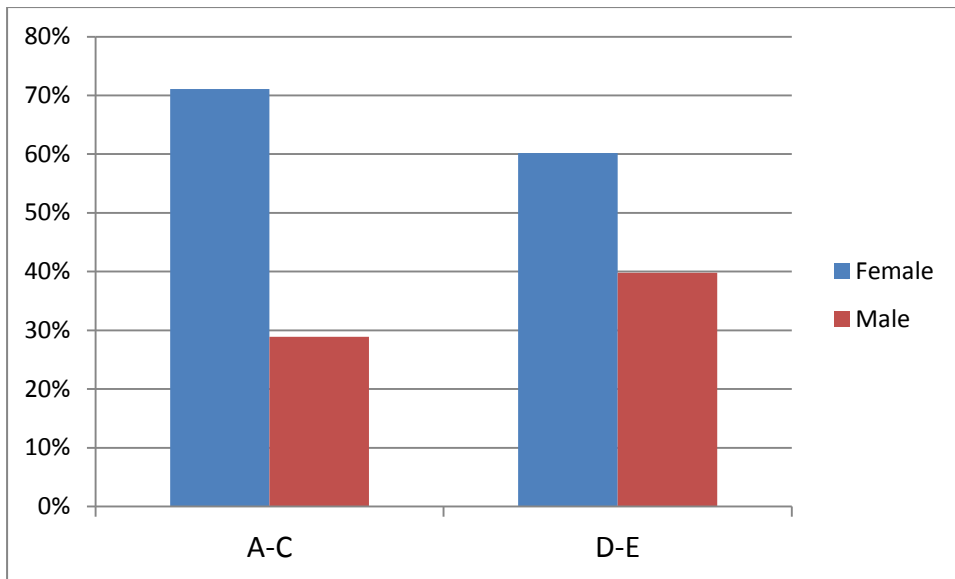


Sex	Register %	Census 2011 %	Variation
Female	65.1%	49.5%	15.6%
Male	34.9%	50.5%	-15.6%

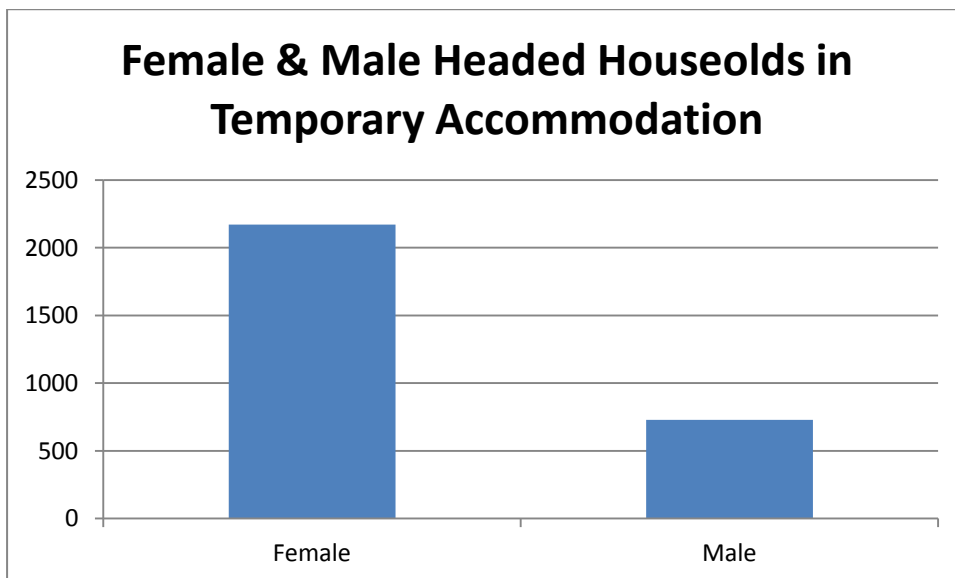
In terms of the interpretation, the data needs to be treated with caution as the housing register data only relates to the head of the household, whereas the census data relates the total population of the Borough.

Sex & Banding

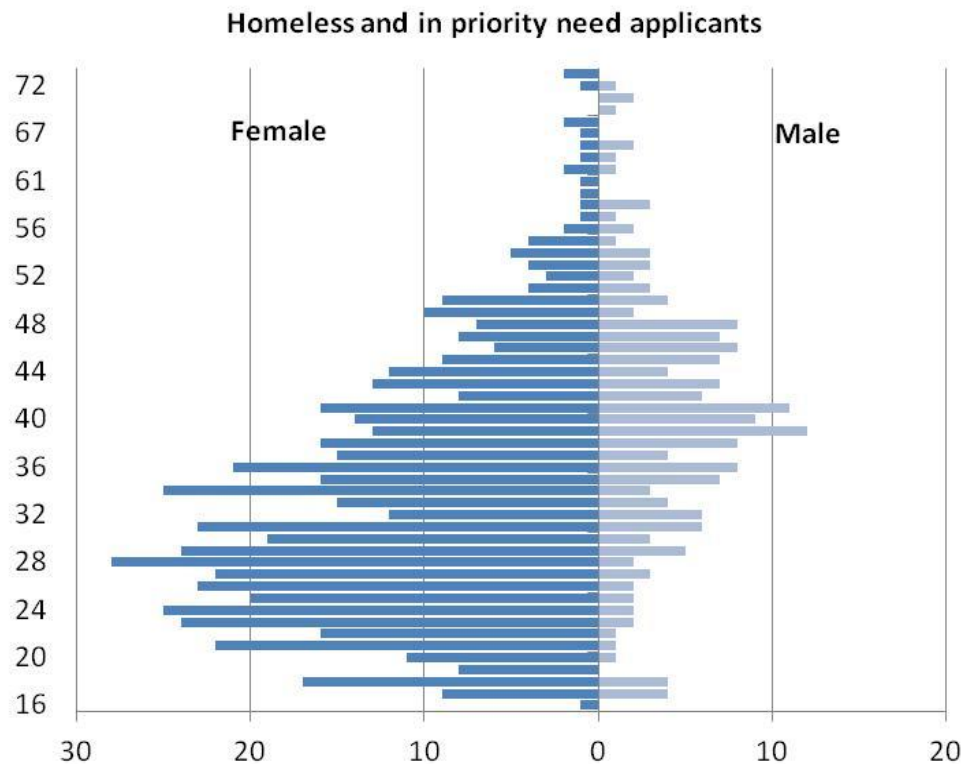
The chart below shows the distribution of Female and Male headed households against the priority bands. Female headed households are disproportionately over-represented in the higher banded cases.



Homeless households in temporary accommodation are primarily placed in Band B. As the chart below shows 75% of households in temporary accommodation are headed by a woman.



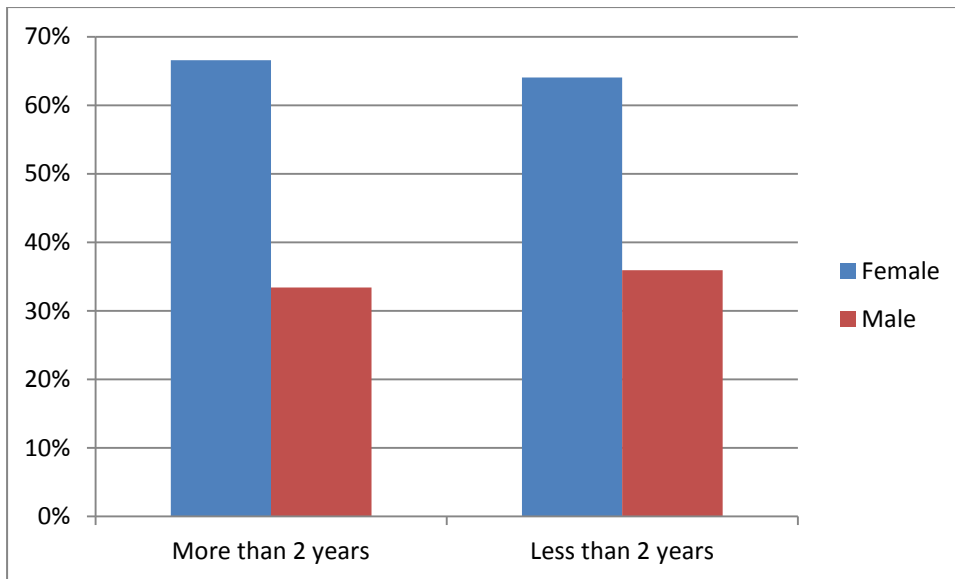
The chart below is taken from the P1e statistical return for the year 2013/14.



The chart again shows the significant over representation of female headed households accepted homeless households. Of the households in temporary accommodation 73% are headed up by a single parent, the majority are women. The chart also indicates a significant difference in the age profile of men and women presenting.

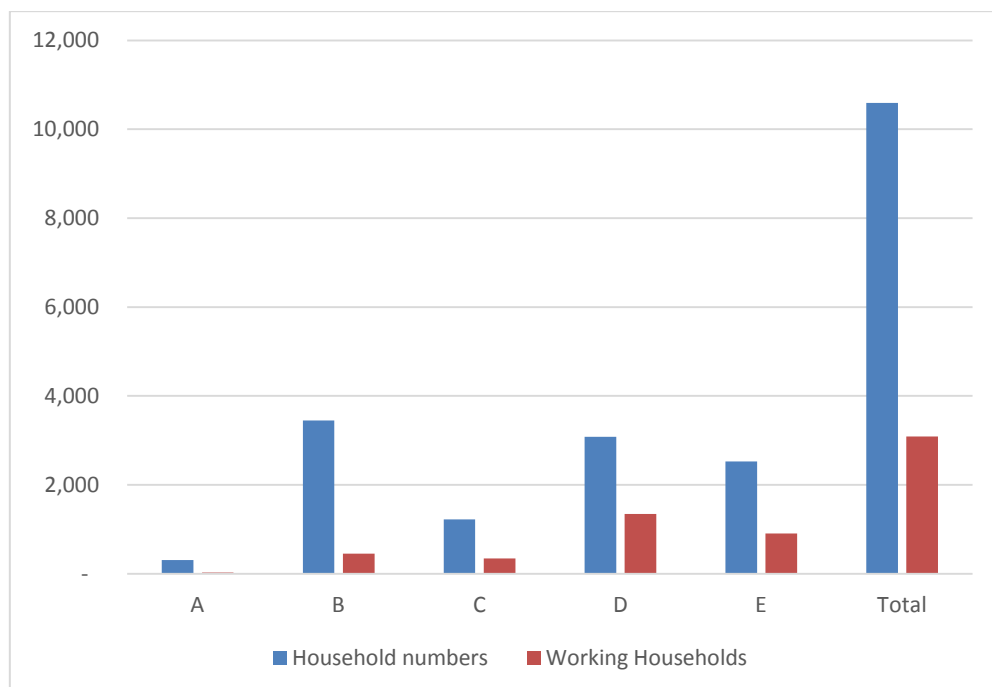
Sex and the Age of the Application

The graph below shows the proportionate spread of male and female headed households, by relative age of the application. Here the pattern is closer in terms of the relative age of the application.

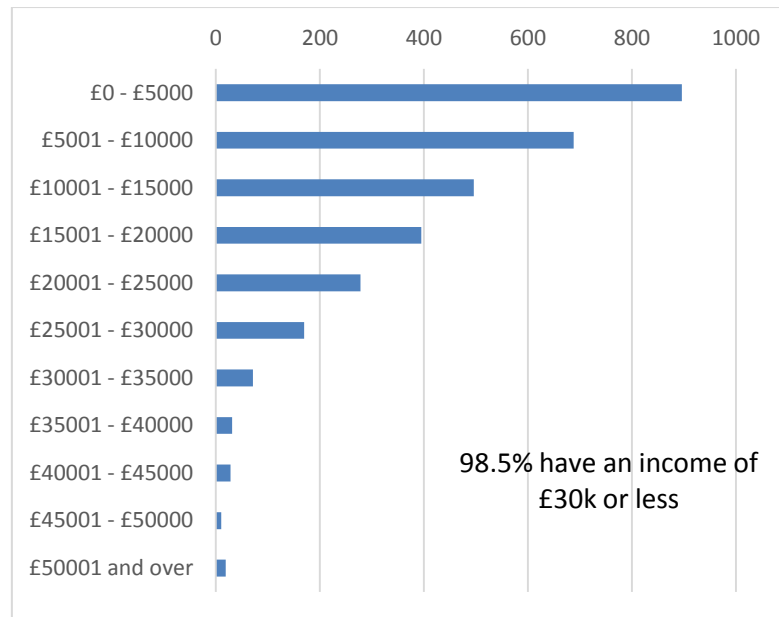


Income Analysis and the Housing Register

Households on the housing register are more likely to be benefit dependent than the wider population, or on low incomes. Only 29% of households on the register declared themselves to be in employment – including self-employment and part-time employment.

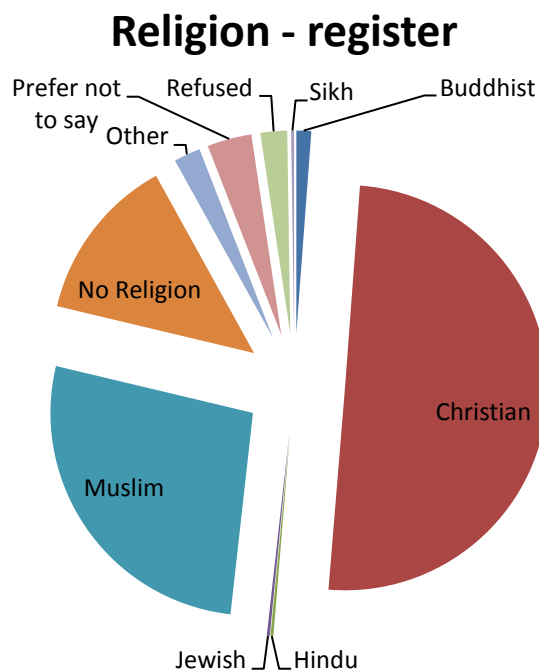


Of those working, most households were earning significantly less than the Borough average.



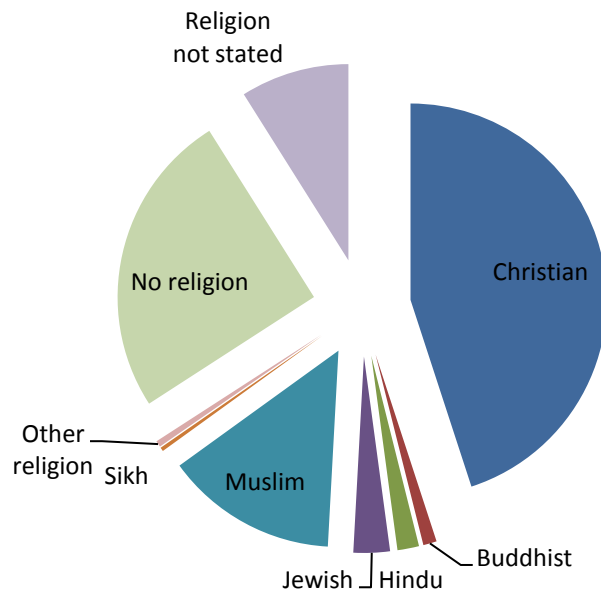
Religion

Applicants are asked to provide information on their religious beliefs when they apply for housing. However, very few applicants have answered this question. The pie-chart below is based on the 5% of applicants that have responded.



There is a reasonable correlation with the Census figures from 2011, despite the small sample size.

Religion - Census 2011



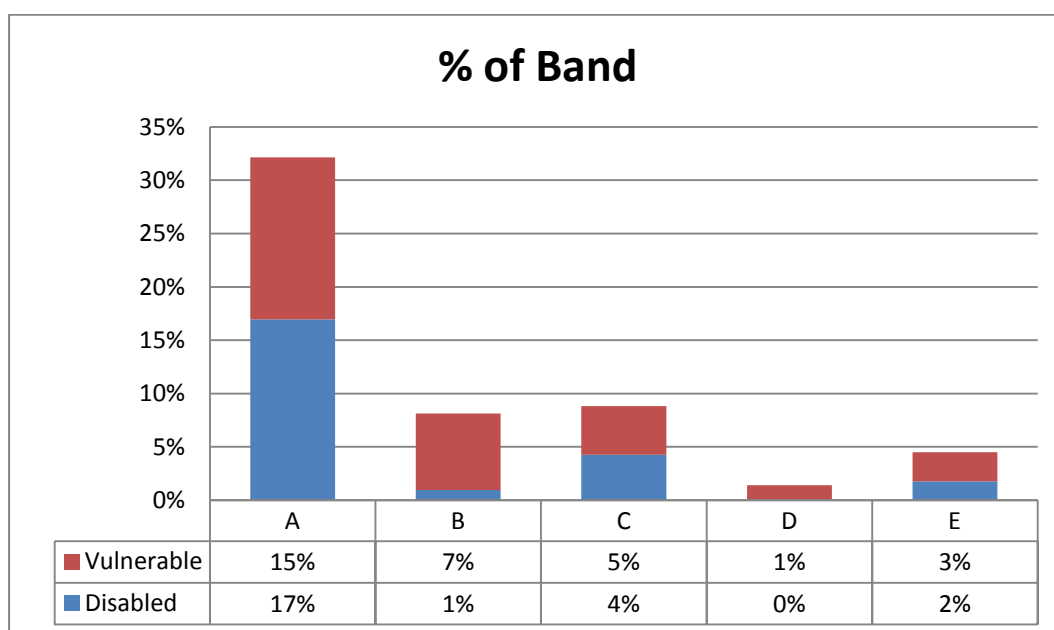
Sexuality

This question again was not routinely answered; fewer than 6% of applicants answered this question. The majority of applicants, 81%, said that they were heterosexual. 18% preferred not to say. Just under 1% of applicants said that they were either gay or lesbian. Currently there is no borough wide information to compare this profile to.



Disability and Vulnerability

In terms of number of disabled and vulnerable people on the housing register, there are around 6% overall. Vulnerability assessments are most often carried out as part of a homeless assessment, and will look at a range of factors including physical and mental health, substance misuse, institutionalisation, and other factors. There is a degree of overlap between the definitions of disability and vulnerability. However, both groups are over-represented in high priority bands. With almost a third of households deemed to be either disabled or vulnerable in Band A. See the chart below.



2) What factors (barriers) might account for this under/over representation?

At the current point in time applications to the housing register are purely self-selecting. There are no barriers in terms of joining the housing register, other than one-year residency. The register is needs based, meaning that those with low-need will be lower banded and are unlikely to be offered housing. Applications to the housing register are likely to be from households that will find it difficult to support other housing options, such as home ownership and private renting. The income analysis of households, above, provides some evidence that housing options are limited, particularly in terms of buying a home.

It is clear that BME households, particularly Black households are impacted adversely on a number of measures of deprivation. Black households are

also overly represented in homelessness statistics. Most accepted homeless households placed in temporary accommodation are placed in Band B. The slight over-representation of Black households in the higher banded categories (45% Bands A-C, 38% Bands D-E) is likely to be due to this.

In terms of the sex of the main applicant a significantly greater proportion of households are headed by women, compared to the population distribution of the borough. There is a further disparity when looking at the numbers in the priority bands, with a greater proportion in the higher bands. 73% of households accepted as homeless are single parents, with the majority being women. As noted above most homeless households will be in Band B.

In terms of religion the number of households responding to the question was small. However there was broad consensus with the Census 2011 figures. There was a small over-representation of Christian and Muslim households; with an under-representation of Jewish and Hindu households.

Disability and vulnerability levels are significantly over-represented in the higher bands in the housing register, specifically in Bands A-C which are to be retained. The housing register is fundamentally driven by housing need. The fact that disabled and vulnerable households are prioritised for housing confirms that the policy objectives are being met.

<p>3) What other evidence or data will you need to support your conclusions and how do you propose to fill the gap?</p>
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The Allocations Scheme is based on legislation and statutory guidance. Levels of housing needs are assessed against current housing circumstances. When prioritising housing we are required to provide reasonable preference to:

- a) homeless households – including households found to be intentionally homeless or deemed not to be in priority need;
- b) people owed a certain homeless duties by any housing authority;
- c) people occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;
- d) people who need to move on medical or welfare grounds; and
- e) people who need to move to a particular locality, a failure of which would cause hardship.

There is substantial evidence to indicate BME, particularly Black households suffer greater levels of deprivation. Black households are also over-represented in homeless statistics.

Given the nature of the scheme, and the legislative requirement that underpin it, the outcome that there is over-representation of vulnerable, disabled, Black and low-income households is not surprising. The over-representation of female headed households relates to the large proportion of single parent households, largely women, that apply and are accepted as homeless.

4) What barriers and factors might account for under/over representation?
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See 3 above.

Step Three: Assessment of Impact

Instruction: Using the information you have gathered and analysed in step 2, you should assess whether and how the proposal you are putting forward will affect any of the existing barriers facing people who have any of the characteristics protected under the Equality Act 2010. State what actions you will take to address any potential negative effects your proposal may have on them.

1) How will your proposal affect existing barriers? (Please tick below as appropriate and use the space to explain why)

Removing Bands D & E

Increase barriers?	Reduce barriers?	No change? X
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The current allocations scheme, by legislation and statutory guidance, is largely needs based. Since the inception of the current scheme in March 2011 no households in bands D and E have been housed. Removing these bands will have no material impact on these households. It will bring efficiencies in that time is not spent on registering and managing around 5,000 applications. It also helps manages expectations. The analysis that we have carried out is that: Black households; disabled and vulnerable groups; female headed households are over-represented in Bands A-C – this reflects relative housing need.

3 year residency criteria

Increase barriers?	Reduce barriers?	No change? X
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By increasing the residency criteria from 1 year to 3 there is no evidence that households with protected characteristics will be adversely impacted. From the analysis that has been carried out, using the proxy of the 'registered date' of the application, there does not appear to be any disproportionate impact on households with respect to ethnicity and sex. This will be monitored carefully over the first year of implementation.

Supporting vulnerable single people

Increase barriers?	Reduce barriers? X	No change?
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The Council is delivering a 'Pathway Model' for helping single vulnerable people live independently. The aim of the Model is to provide supported accommodation or floating support to build capacity. When the person is ready for moving on, they will be assessed, and appropriate accommodation provided.

Improved assessment for support housing

Increase barriers?	Reduce barriers? X	No change?
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The aim is to improve the assessment for accessing sheltered housing so that that assessment is more holistic, and takes into account both housing needs as well as support needs. This will particularly benefit older people.

Additional Quotas: Care Leavers with Children and Armed Forces

Increase barriers?	Reduce barriers? X	No change?
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Care Leavers have a quota for the provision of accommodation at the point where they are deemed ready for independent living (through Children and Families). However, this quota only applies to single people. Care Leavers that are pregnant or have children of their own do not go through this route, and must make an application through the homelessness process. This change addresses this anomaly.

Changes in legislation require that we give some priority to ex-Armed Forces in our Allocations Scheme. This is an area where there is little data. This change addresses our legal responsibilities, but will be monitored closely over the first year of implementation.

Exceptions Panel

Increase barriers?	Reduce barriers? X	No change?
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The Allocations Scheme cannot anticipate every scenario. On occasion households will present with a complex set of factors that fall outside of existing policy. We should not fetter our discretion. The aim of establishing a panel is to consider cases with a degree of consistency and to ensure that there is proper recording and monitoring and reporting of exceptional decisions.

2) What specific actions are you proposing in order to reduce the existing barriers and imbalances you have identified in Step 2?

From the analysis in step 2 the households on the housing register do not reflect the characteristics of the borough as a whole. However, the Allocations Scheme is based on housing need - levels of deprivation, poverty, ill-health has a differential impact on certain groups. It is understandable that these groups are over-represented on the register.

Of the changes outlined above it is anticipated that the changes will either reduce barriers or have no change. No mitigating actions are considered. Close monitoring will be put in place across all these changes.

3) If there are barriers that cannot be removed, what groups will be most affected and what Positive Actions are you proposing in order to reduce the adverse impact on those groups?

See 1 and 2 above.

Step Four: Consult on the proposal

Instruction: Consultation is an essential part of an impact assessment. If there has been recent consultation which has highlighted the issues you have identified in Steps 2 and 3, use it to inform your assessment. If there has been no consultation relating to the issues, then you may have to carry out consultation to assist your assessment.

Make sure you reach all those who are likely to be affected by the proposal. Potentially these will be people who have some or all of the characteristics listed below and mentioned in the Equality Act 2010:

- Age
- Disability
- Gender Re-assignment
- Marriage and Civil Partnership
- Pregnancy and Maternity
- Race, Religion or Belief
- Sex (formerly Gender) and
- Sexual Orientation

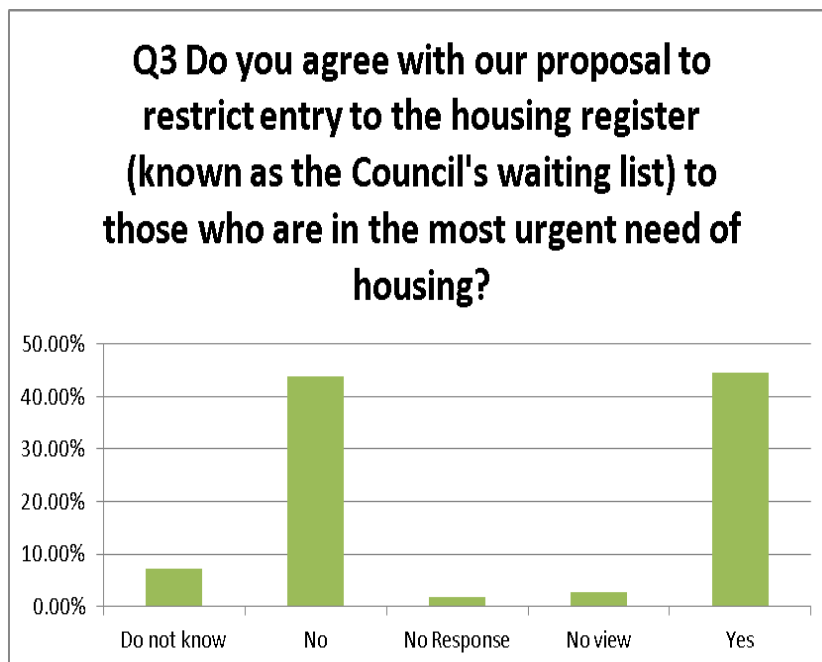
Do not forget to give feedback to the people you have consulted, stating how you have responded to the issues and concerns they have raised.

1) Who have you consulted on your proposal and what were the main issues and concerns from the consultation?

- 1) All households on the Housing Register were invited to participate in consultation.
- 2) An online-survey was conducted which resulted in more than 300 response.
- 3) Registered Providers, mainly Housing Associations, were consulted with.
- 4) Face-to-face sessions were held with homeless households through the Temporary Accommodation User forum.
- 5) There were face-to-face sessions at the Homelessness Forum.
- 6) Consultation sessions were carried out with Council Tenants.

Consultation focussed on the major changes that were to be implemented. In terms of the key proposals that were consulted on. There were a range of opinions expressed.

In terms of removing lower banded cases. The majority in favour was very small 45% in favour against 44% of households opposed to it.



There were a range of comments offered, including:

Because there is no point keeping people on it who will never have a realistic prospect of getting social housing and it is cruel to give them hope. It is also a waste of manpower, money and bureaucracy to maintain such a needlessly large register.

Because those on band D and E are there for a reason and qualify to be there and are assessed every year what will happen to people on D and E who are already there will they be moved up to C.

I agree that people with urgent needs should obviously be housed first but young people wanting to set up home and who cannot afford to rent privately should also be able to apply for somewhere to live.

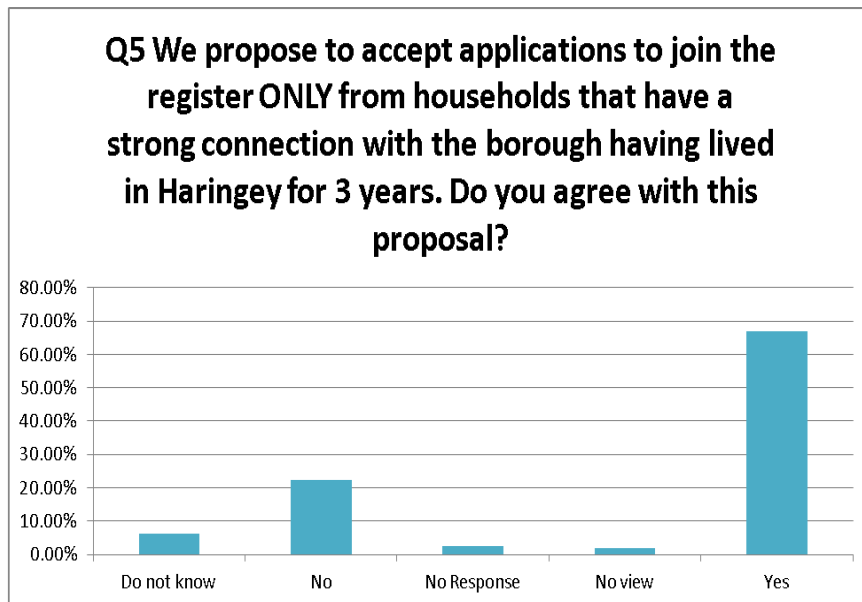
I do agree because people like myself who's been on the waiting list for a while and private renting is very expensive now the cap has kicked in it will give people who need housing a better chance.

It does not allow room to deal with those who were not in the top bands, and though the lower bands were told that they will be waiting a long time, or never get anything in the Borough, so they weren't getting anywhere anyway, just cutting the rest of us off isn't getting us anywhere either.

People's housing circumstances, change, work and relationships may breakdown and other choices are needed to be made.

As part of the implementation plan for the new Allocations Scheme there will be a comprehensive Communication Strategy. The Strategy will address the rationale for introducing the changes and address various questions that have been raised: including other options to Council housing and what happens when circumstances change, and so on.

In terms of the proposal to restrict housing to those that have lived in the borough for 3 years or more there was clear support for this.



Some of the comments to this question:

The waiting list is too long for the council to accept just anyone from other boroughs or countries.

*One living in this Borough knows this borough better than outsider
I've lived in Haringey for 36 years so it might give us a better chance then moving to another borough.*

Like I said before it will help those people like me who has been on waiting list for more than 13 years.

It will mean people from other boroughs cannot just apply.

It is only right that applicants from the area are given priority over applicants with no connection to the borough.

It can provide housing opportunities for local residents.

I think it is far fairer to offer someone who has been living in an area for sometime a chance to have a property in a place that they know.

I think it is wrong that people can come from outside the borough and be housed ahead of others who are already on the list currently.

What about people moving to the borough that are contributing just as much to the borough, and sometimes more.

Makes it difficult to for short stay residents to ever get social housing, its seems like just another way of limiting the shortlist

It is not possible to mitigate all the negative perceptions, without significantly changing the policy. However, the establishment of the Exceptions Panel will allow for exceptional cases to be considered.

2) How, in your proposal have you responded to the issues and concerns from consultation?

As part of the implementation plan for the new Allocations Scheme there will be a comprehensive Communication Strategy. The Strategy will address the rationale for introducing the changes and address various questions that have been raised: including other options to Council housing and what happens when circumstances change, and so on.

It is not possible to mitigate all the negative perceptions around the 3 year residency rule, without significantly changing the policy intent. However, the establishment of the Exceptions Panel will allow for exceptional cases to be considered.

Close monitoring of these changes will be carried out.

3) How have you informed the public and the people you consulted about the results of the consultation and what actions you are proposing in order to address the concerns raised?

Consultation feedback will be addressed through the Communication Strategy.

Step Five: Addressing Training

Instruction: The equalities issues you have identified during the assessment and consultation may be new to you or your staff, which means you will need to raise awareness of them among your staff, which may even training. You should identify those issues and plan how and when you will raise them with your staff.

- 1) Do you envisage the need to train staff or raise awareness of the equalities issues arising from any aspects of your proposal and as a result of the impact assessment, and if so, what plans have you made?**

As part of the Implementation Plan a range of changes will be needed: including changes to procedures, systems, correspondence and so on. The range of changes will require training for staff. As part of this training package equalities issues will be addressed.

Step Six: Monitoring Arrangements

Instruction: If the proposal is adopted, there is a legal duty to monitor and publish its actual effects on people. Monitoring should cover all the protected characteristics detailed in Step 4 above. The purpose of equalities monitoring is to see how the proposal is working in practice and to identify if and where it is producing disproportionate adverse effects and to take steps to address those effects. You should use the Council's equal opportunities monitoring form which can be downloaded from Harinet. Generally, equalities monitoring data should be gathered, analysed and report quarterly, in the first instance to your DMT and then to the Corporate Equalities Board.

1) What arrangements do you have or will put in place to monitor, report, publish and disseminate information on how your proposal is working and whether or not it is producing the intended equalities outcomes?

- Who will be responsible for monitoring?
- What indicators and targets will be used to monitor and evaluate the effectiveness of the policy/service/function and its equalities impact?
- Are there monitoring procedures already in place which will generate this information?
- Where will this information be reported and how often?

- Monitoring information will be provided by the Quality Officer, but overall responsibility will rest with the Head of Housing Needs and Lettings.
- A set of routine reports, on the computer system OHMS, have been established to monitor protected characteristics. These are already in place and have been used to generate the information in section 2. These will be enhanced to test pre and post changes.
- We would expect housing priority, offers and lettings to be in proportion to the characteristics of households on the register.
- A quarterly report will be presented to the Senior Management Team, setting out findings with a detailed EQIA to be completed a year from implementation.

Step Seven: Summary of Impact

Instruction: In the table below, summarise for each diversity strand the impacts you have identified in your assessment.

Age	Disability	Race	Sex	Religion or Belief	Sexual Orientation	Gender Reassignment	Marriage and Civil Partnership	Pregnancy and Maternity
Positive impact The assessment process for sheltered accommodation will be more holistic. Improved outcomes for care leavers with children	Positive Impact Disabled and vulnerable households are prioritised in the allocations scheme. The changes proposed should deliver better long-term outcomes.	Neutral Black households are over represented on the housing register. However, these proposals will not impact on that.	Neutral Female headed households are over represented on the housing register. However, these proposals will not impact on that.	Neutral Data is limited but no adverse impact is expected.	Neutral Data is limited but no adverse impact is expected.	Neutral Data is limited but no adverse impact is expected.	Neutral Data is limited but no adverse impact is expected.	Positive Impact Improved outcomes for care leavers with children

Step Eight: Summarise the actions to be implemented

Instruction: Please list below any recommendations for action that you plan to take as a result of this impact assessment.

Issue	Action required	Lead person	Timescale	Resource implications
Communication Plan	To address consultation outcomes, and outline mitigating actions	Head of Needs & Lettings	Oct-Dec 2014	In house
Implementation Plan	a) To address a range of training needs, including equalities awareness. b) Ensure proper recording, monitoring and reporting of protected characteristics.	Head of Needs & Lettings	Oct 2014 – April 2015	To be confirmed
Exceptions Panel	Clear terms of reference, procedures and reporting. With agreed sign-off and monitoring protocol.	Head of Needs & Lettings	Nov 2014	In house

Step Nine: Publication and Sign Off

Instruction: It is standard practice to publish the results of impact assessments. There is also a specific duty to provide as much relevant equality information as possible to enable the public to judge how well we are doing on our public sector equality duty. EqlA results are published not simply to comply with the law but also to make the whole process and its outcome transparent and have a wider community ownership. You should summarise the results of the assessment and intended actions and publish them. You should consider in what formats you will publish in order to ensure that you reach all sections of the community.

1) When and where do you intend to publish the results of your assessment, and in what formats?

To be confirmed.

Assessed by (Author of the proposal):

Name: Perry Singh

Designation: Head of Housing Needs and Lettings (Interim)



Signature:

Date: 11 September 2014

Sign off by Directorate Management Team:

Name:

Designation:

Signature:

Date: