



Tenancy Strategy for Harborough District

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1. Introduction

Purpose of the strategy

Harborough District Council transferred its housing stock in December 2007 to a new Registered Provider (Seven Locks Housing) with the agreement of a majority of tenants who voted in favour of the proposed transfer. The purpose of this Tenancy Strategy is to provide guidance for Registered Providers who own social housing in Harborough District, about the approach that the Council wishes to see them take in framing their own tenancy policies, including local guidance on the use of the 'affordable rent' tenure of affordable housing. The Tenancy Strategy seeks to maintain a balance between providing security for tenants and ensuring provision of accommodation for home-seekers.

Partnership Approach

Harborough District Council has been actively working with Registered Providers to ensure the development of new affordable homes and develop fair and transparent choice based allocations of affordable homes; locally through Harborough Home search (established in 2000); and at sub regional level through the development of Leicestershire Home search in partnership with all Leicestershire Districts as well as Registered Providers.

Registered Providers are required to take account of the Tenancy Strategy in their Tenancy Policies so the involvement of Registered Providers is essential for development of an effective Tenancy Strategy for Harborough District. Registered Providers owning properties in the Harborough District include:

- East Midlands Housing Association
- Waterloo Group
- Riverside Housing Association
- Nottingham Community Housing Association
- Seven Locks Housing
- Derwent Living
- Asra Housing Association

Monitoring and Review

The Tenancy Strategy for Harborough District will be reviewed every three years or more frequently if there are significant changes in government policy or in local housing markets, or regular monitoring shows evidence of adverse impacts on vulnerable home seekers and tenants. Monitoring of outcomes will include:

- Numbers of relets converted from Social Rent to Affordable Rent, including sizes, types and location of homes.
- Analysis of new homes according to size, location, and tenancy type

- Affordable Rent levels compared to social rent.
- Priority categories of successful home seekers and through the Leicestershire CBL Scheme including monitoring of equality outcomes.
- Fixed term tenancies as a percentage of all social rent and affordable tenancies allocated in Harborough District
- Analysis of fixed term tenancies according to size/type of household and length of tenancy
- Percentage of fixed term tenancies not renewed and the reasons why
- Impact of welfare reform including the number of new tenants receiving support with housing costs through Housing Benefit/Universal Credit; increase/decrease in rent arrears; homelessness arising from tenancy failures and repossessions

2. Summary

Registered Providers can now offer tenancies at a social rent as fixed term tenancies for a specified period instead of offering a “Tenancy for Life.” The minimum period for this type of fixed term tenancy is two years. They must publish clear and accessible tenancy policies that outline their approach to tenancy management, taking into account the guidance included in the local authority’s Tenancy Strategy and the requirements of the Directions on Regulatory Standards 2012.

The Localism Act 2011 places a duty on all local authorities to publish a Tenancy Strategy by 15th January 2013.

Housing for sale or private rent is more expensive in Harborough District than most other parts of Leicestershire. There is a limited stock of social rented accommodation available in Harborough District to meet the needs of home seekers who cannot afford housing for sale or private rent. Welfare reform will introduce fundamental changes in the welfare system for tenants of social housing and private rented housing.

Guidance to registered providers:

- Registered Providers intending to convert some of their relets to affordable rent should have regard to the impact of tenancy conversion on the availability of social rented housing in Harborough District, particularly for housing types where unmet need is greatest
- Providers should also consider the ability of tenants to pay for affordable tenancies to minimise the risk of homelessness because tenants cannot afford to make up the gap between benefits payments and the rent.
- The Council supports the use of probationary tenancies (also called starter or introductory tenancies) to manage the risk of future breaches of the tenancy
- Registered Providers should ensure that their tenancy policy identifies and justifies the circumstances where they intend to use flexible fixed term tenancies. Where fixed term tenancies are issued, the Council recommends that the minimum term for a fixed term tenancy should be five years.
- The following categories of tenancy should have a lifetime tenancy or a fixed term longer than five years including older people (60+) in designated specialist supported housing or extra care – lifetime tenancy, and tenants with long term disability (minimum of ten years)

- In exceptional circumstances a tenancy for a minimum term of no less than two years may be appropriate as set out and justified in the provider's tenancy policy.
- Either social rent or affordable rent can be charged on these tenancies.
- The security and rights of existing social rented tenants should be protected if they transfer or exchange to another tenancy
- The landlord should provide clear, concise and easily accessible advice and information to tenants at all stages of their tenancy (including pre-tenancy) and set out clearly their policies about renewal or non renewal of the tenancy before a new tenant signs their tenancy agreement.
- Fixed term tenancies should be renewed automatically except in specific circumstances set out on page 16
- Providers must take full account of the individual circumstances of household members and before deciding not to renew a tenancy. Providers also have a duty to co-operate with the Council in preventing homelessness.
- Tenants must be given at least six months notice of the landlords intention not to renew the tenancy.
- Adequate reasons for the decision to end the tenancy should be given to the tenant along with information on the right to appeal the decision and guidance on how to do this.
- Where a Fixed Term Tenancy is coming to an end and a notice has been served, providers should ensure that tenants receive effective housing options advice and assistance to enable them to find suitable alternative accommodation.
- Registered providers should include within their Tenancy Policy the way in which a tenant or a prospective tenant may appeal against or complain about the length of a fixed term/flexible tenancy offered or the type of tenancy offered, and against a decision not to grant another tenancy on the expiry of the fixed term.

The Tenancy Strategy for Harborough District will be reviewed every three years or more frequently if there are significant changes in government policy or in local housing markets, or regular monitoring shows evidence of adverse impacts on vulnerable home seekers and tenants.

3. Scope of the Strategy

Localism Act

The Localism Act enables Registered Providers to offer tenancies at a social rent as fixed term tenancies for a specified period instead of offering a “Tenancy for Life.” The minimum period for this type of fixed term tenancy is two years.

Registered Providers are required by the revised Regulatory Framework for Social Landlords (Directions on Regulatory Standards 2012) to publish clear and accessible tenancy policies that outline their approach to tenancy management, taking into account the guidance included in the local authority’s Tenancy Strategy.

The Localism Act 2011 places a duty on all local authorities to publish a Tenancy Strategy by 15th January 2013.

The Tenancy Strategy should include consideration of what kind of tenancy should be offered, the circumstances leading to the grant of a particular kind of tenancy and the length of the tenancy if it is for a fixed term as well as arrangements for renewal of a fixed term tenancy and how it is terminated.

Strategic Links

Harborough District Council is working to ensure that local people receive excellent services as efficiently as possible. Our aim is to deliver more affordable homes for people in housing need and make the best possible use of existing affordable housing in the district.

The Tenancy Strategy contributes to achievement of these aims through guidance on the use of fixed term tenancies and affordable rent. It sits alongside and supports the Homelessness Strategy Housing Strategy and Allocations Policy for Harborough District. (www.harborough.gov.uk)

4. Change in local housing markets

Affordability Issues

Prevention of homelessness depends on making effective use of resources including the existing housing stock (all tenures) as well as increasing the availability of affordable housing provision through the Council's enabling role. However, the overall affordability of the local housing market in Harborough District makes it increasingly difficult to meet the housing needs of households on lower incomes, vulnerable people and homeless households.

Harborough has the highest house prices in Leicestershire (£187,000 in second quarter of 2011 compared with £155,000 for all Leicestershire authorities – *source CLG*). There has been a small reduction in the average prices of all houses in Harborough since 2008 but lower quartile house prices which are most affordable for households on lower/middle earnings have not reduced. The number of house sales has significantly reduced (1252 in 2010 compared with 1993 in 2007 – *source CLG*).

The ratio of house prices to household income (range 7.1 -8.41 for lower/middle income households in 2010 – *source CLG*) remains above the average for all Leicestershire authorities (range 6.8 -6.38 for lower/middle income households in 2010– *source CLG*). Households need an annual gross income of over £40,000 to buy a lower priced property with a mortgage.

Higher affordability ratios and , restricted availability of mortgages at affordable interest rates for households who do not have a substantial deposit, and the current gap between annual inflation rates and earnings growth, make owner occupation less affordable for first time buyers.

The table below (*Source: Valuation Office Agency August 2012*) shows that private rents in Harborough are significantly higher than the overall level of private rents in Leicestershire (*Leicestershire figures shown in brackets*).

Private Sector Rents in Harborough District	Average rent per calendar month £	Lowest Quartile rent £	Highest Quartile rent £
One bedroom	439 (401)	425 (350)	465 (430)
Two bedroom	542 (506)	495 (465)	575 (550)
Three bedroom	676 (604)	600 (550)	725 (650)
Four bedroom	1040 (918)	795 (700)	1200 (895)
<u>All tenancies</u>	603 (546)	460 (440)	650 (595)

Analysis of housing register

There is a limited stock of social rented properties with only 200-250 lets per year. The housing register currently stands at 1611 households (September 2012)).

Funding for affordable homes

The Affordable Housing Programme for 2011-15 is meeting the need for more affordable homes by supporting provision of the new affordable tenancy and shared ownership. Providers are expected to supplement grant funding from the Homes and Communities Agency through cross subsidy from conversion of vacant social rent homes into other tenures, and also making use of other funding sources such as developer contributions through s106 agreements.

Affordable Rent can be set at up to 80% of the gross market rent, including service charges. Tenants in Affordable Rent properties will be eligible for Housing Benefit, rather than Local Housing Allowance.

Welfare Reform

The Welfare Reform Act 2012 will lead to fundamental changes in the welfare system intended to reduce dependency on welfare, improve incentives to seek work, make work pay and reduce overall government spending. Tenants of working age living in social and affordable housing or private sector rented housing who are in receipt of welfare payments could be adversely affected by one or more of the changes introduced in the Welfare Reform Act, including:

- From October 2013 the roll out of Universal Credit will merge existing means tested benefits for employment, housing and childcare into a single payment to the claimant rather than their landlord. Full implementation of Universal Credit will take place by October 2017.
- Reductions in Housing Benefit for tenants of working age who are under occupying social rented properties.
- Income from most benefits capped at £26,000 per annum for couples and £18,200 per annum for single persons or childless couples.
- Local Housing Allowance for tenants living in private sector rented housing to be calculated according to the existing rate indexed annually to the Consumer Price Index rather than actual market rents

Other changes in welfare benefits such as replacement of Disabled Living Allowance by Personal Independence Payments and the replacement in April 2013 of a nationally scheme for Council Tax by locally determined schemes may also have an impact on the ability of tenants of working age to sustain their tenancy.

5. Consultation on the strategy

A scenario planning workshop in November 2011, organised by North West Leicestershire District Council, attended by representatives of all the District Councils in Leicestershire, as well as a wide range of key stakeholders including statutory and non-statutory partners/agencies, considered the issues arising from the Localism Act with regard to tenancy allocations and management of tenancies.

The scenario planning workshop focused on social housing and considered the issues from four different but overlapping perspectives:

- **Home seekers and tenants.** Their priorities are security of tenure, stability and affordability in the long term. Some may welcome opportunities to move within and outside the social and affordable housing market.
- **Council priorities** include meeting needs for social and affordable housing, achieving sustainable neighbourhoods and communities and making the best use of available resources in the area.
- **Registered providers and local authorities who are landlords** aim to meet the need for social and affordable housing, to enable sustainable neighbourhoods and communities, and to manage sustainable, not-for-profit, businesses.
- **Other interested parties** including health and social care, advice agencies etc. Their priorities include improved health and wellbeing, reducing inequalities and disadvantage and economic stability.

The workshop considered how different perspectives could be balanced, and whether or not there should be different approaches to reflect the varying needs of home seekers and tenants; including for example general needs family accommodation and non-family housing, accessible and adapted housing, and long term specialist housing with support such as sheltered housing and extra care.

It was acknowledged that there are some potential difficulties for Registered Providers who operate across several local authority areas, in responding to varying requirements of tenancy strategies produced by different local authorities.

However, the scenario planning workshop has helped in establishing common ground between local authorities (in Leicestershire) and Registered Providers, about issues such as the circumstances where fixed term tenancies are appropriate, the minimum terms of those tenancies, and the process to be followed prior to renewal, as well as the continuing use of lifetime tenancies for older people and disabled persons.

Further consultation has been undertaken through a meeting of the Harborough Housing Forum on the 22nd November 2012. Feedback from the Harborough Housing Forum is set out below:

<p>Is there anything missing from the guidance?</p>	<p>Ensure that expectations of the Council are clear and realistic.</p> <p>How to ensure that the tenancy strategy can effectively influence tenancy policies adopted by registered providers.</p>
<p>Are there any households who should have either a lifetime tenancy or a fixed term longer than five years? (Who are they and what should be the minimum term)</p>	<p>All registered providers are using starter tenancies or considering their use for new tenants.</p> <p>Major providers in Harborough District, including EMHA and SLH, are not currently planning to introduce flexible/fixed term tenancies.</p> <p>Lifetime tenancy or longer fixed term to support sustainable communities should include:</p> <ul style="list-style-type: none"> ▪ Older people (60+?) ▪ Families with young children ▪ People with disabilities/special needs ▪ Rural village locations where availability of alternative accommodation is limited?
<p>What is the best way of monitoring the impact of the tenancy strategy</p>	<p>Significant impacts from use of affordable tenancies or flexible fixed term tenancies may not be apparent for several years.</p> <p>Affordable tenancies up to 80% of market rent are the norm for new housing development by registered providers because of substantial cut in Social Housing Grant.</p> <p>Limited scope for social housing for rent unless additional resources are available.</p> <p>Monitor differentials between social rent, affordable rent and market rent and impacts e.g:</p> <ul style="list-style-type: none"> ▪ Affordability ▪ Impact on communities ▪ Impact on households <p>Monitor impact of converting vacancies in existing housing stock to affordable rent on availability of cheaper social housing for priority/high need home seekers.</p> <p>Monitor tenancy take up all types</p> <p>Monitor impact of fixed term tenancies on homelessness in Harborough District.</p> <p>Need for consultation to avoid adverse impacts of fixed term tenancies on vulnerable groups.</p>

The draft strategy has been published on the Council's website and circulated to registered providers with housing stock in Harborough District along with a draft equality impact assessment and a survey form .

6. Affordable Rent

Delivery of affordable rent

The National Planning Policy Framework, published in March 2012 defines affordable housing as:

“Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision. “

Social rented housing is owned by local authorities and private Registered Providers (as defined in section 80 of the Housing and Regeneration Act 2008). Guideline target rents for social rent are determined through the national rent regime.

Affordable rented housing is let by local authorities or Registered Providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.”

The Council understands that new homes let as affordable tenancies will be the primary means of providing future affordable housing development, particularly for schemes which rely upon funding from the Homes and Communities Agency.

However, social rent is still needed for tenants on low incomes. The Council will continue to monitor housing need and promote provision of lower cost social rented housing where required and feasible via affordable housing contributions in S106 Agreements.

Conversion to affordable rent

Providers can decide what proportion of their re-lets will be converted to Affordable Rent to fund new supply. However, they should have regard to the impact of tenancy conversion on the availability of social rented housing in Harborough District, particularly for housing types where unmet need is greatest.

Guidance to registered providers

Some lower income households may not be able to afford the increased cost of affordable rent because they cannot make up the difference through Housing Benefit. This potentially limits the demand for affordable rent to households able and willing to pay higher rents without support.

Providers should consider the ability of tenants to pay for affordable tenancies to minimise the risk of homelessness because tenants cannot afford to make up the gap between benefits payments and the rent.

7. Tenancies

Flexible fixed term tenancies

Traditionally secure/assured tenants of all types of social housing have been granted a 'tenancy for life'. Those tenancies have only been brought to an end by the Landlord where, for example there has been a breach of tenancy or the property has been abandoned. The natural consequence of this approach particularly in general needs family accommodation, is that older people (through lapse of time) are under-occupying family housing which is in high demand and they have no desire to move to smaller or a different type of accommodation that may be designated suitable for older people. Incentivising such moves has in the past been successful on a small scale.

The decision to use fixed term tenancies and the length of these tenancies ultimately rests with Registered Providers. Providers can offer lifetime tenancies under Affordable Rent, should they wish to do so. However, fixed term tenancies should not be used for all new tenancies. Providers should identify and justify the circumstances where they intend to use fixed term tenancies as part of their tenancy policy.

The Council supports the use of probationary tenancies (also called starter or introductory tenancies) to manage the risk of future breaches of tenancy agreements. Probationary tenancies shall be for a period of 12 months, or a maximum of 18 months where reasons for extending the probationary period have been given and where the tenant has the opportunity to request a review. The length of any fixed term/flexible tenancy should exclude the probationary period.

Where fixed term tenancies are issued, the Council recommends that the minimum term for a fixed term tenancy should be five years. In exceptional circumstances a tenancy for a minimum term of no less than two years may be appropriate as set out and justified in the provider's tenancy policy. Either social rent or affordable rent can be charged on these tenancies.

The following categories of tenancy should have a lifetime tenancy or a fixed term longer than five years:

- Older people (60+) in designated specialist supported housing or extra care – lifetime tenancy
- Tenants with long term disability minimum of ten years

Transfers and mobility moves

Providers should ensure that the security and rights of existing social housing tenants should be protected including when they move to another social rented home through transfer or exchange. This will not apply when a tenant chooses to move to accept a tenancy let on affordable rent terms.

Providers should encourage mutual exchanges to meet tenant needs and ensure more effective use of their housing assets, including offering equivalent security of tenure on exchange even when there is no obligation to do so.

Tenancy Review

The landlord should provide clear and concise advice and information to tenants at all stages of their tenancy (including pre-tenancy) and set out clearly their policies about renewal or non renewal of the tenancy before a new tenant signs their tenancy agreement.

Fixed term tenancies should be renewed automatically unless one or more of the following circumstances apply:

- There has been a substantial improvement in the tenant's financial situation so that they can afford to move to a different housing tenure.
- The tenant comes into legal ownership of another home or property.
- There have been serious breaches of tenancy by the tenant sufficient to justify possession proceedings under the terms of their tenancy agreement.
- The property is under-occupied by more than one bedroom. However, the tenant should normally be offered an alternative home with a registered provider.
- The property has been extensively adapted and no-one living at the property requires the adaptations. However, the tenant should normally be offered an alternative home with a registered provider.
- The property is to be sold or refurbished

Providers must take full account of the individual circumstances of household members and before deciding not to renew a tenancy. Providers also have a duty to co-operate with the Council in preventing homelessness.

Relevant circumstances may include ill health; disability or terminal illness; a need for support; impact on children including access to education and availability of suitable alternative accommodation in the local area.

Tenants must be given at least six months notice of the landlords intention not to renew the tenancy. Adequate reasons for the decision to end the tenancy should be given to the tenant along with information on the right to appeal the decision and guidance on how to do this.

Where a Fixed Term Tenancy is coming to an end and a notice has been served, providers should ensure that tenants receive effective housing options advice and assistance to enable them to find suitable alternative accommodation.

The Right to Appeal

Registered providers should include within their Tenancy Policy the way in which a tenant or a prospective tenant may appeal against or complain about the length of a fixed term/flexible tenancy offered or the type of tenancy offered, and against a decision not to grant another tenancy on the expiry of the fixed term.

The appeals process should allow tenants to make an informed decision as to whether to submit an appeal, including information about how to seek independent advice and where necessary, appropriate representation.

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APPENDIX A Equality Impact Assessment

Title of the policy/report /strategy/service	Tenancy Strategy
Date	Ongoing
Lead Officer	Stephen Pointer, Policy Manager
Who else is involved in undertaking this assessment?	Ann Ball, Housing Needs Manager; Jim Wheeler, Housing Officer

Step 1 – Overview of policy/function being assessed

A. Outline: What is the purpose of this policy? (specify aims and objectives)
The purpose of this Tenancy Strategy is to provide guidance for Registered Providers who own social housing in Harborough District, about the approach that the Council wishes to see them take in framing their own tenancy policies, including local guidance on the use of the 'affordable rent' tenure of affordable housing.
B. What specific groups is the policy designed to affect/impact?
Home seekers on the housing register and any tenant of a Registered Provider in Harborough District
C. Which groups have been consulted as part of the creation or review of the policy?
<ul style="list-style-type: none"> ▪ Home seekers and tenants. Their priorities are security of tenure, stability and affordability in the long term. Some may welcome opportunities to move within and outside the social and affordable housing market. ▪ Council priorities include meeting needs for social and affordable housing, achieving sustainable neighbourhoods and communities and making the best use of available resources in the area. ▪ Registered providers and local authorities who are landlords aim to meet the need for social and affordable housing, to enable sustainable neighbourhoods and communities, and to manage sustainable, not-for-profit, businesses. ▪ Other interested parties including health and social care, advice agencies etc. Their priorities include improved health and wellbeing, reducing inequalities and disadvantage and economic stability.

Step 2 – What we already know and where there are gaps

A. List any existing information/data you have/monitor about different diverse groups in relation to this policy? Such as in relation to ethnicity, religion, sexual orientation, disability, age, gender, transgender etc.
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Data/information such as:

- **Consultation**
- **Previous Equality Impact Assessments**
- **Demographic information**
- **Anecdotal and other evidence**

The housing register. Full equalities monitoring data (is accessible through the Abris database used to manage and report on the housing register. This data can be cross referenced by specific household details and housing need information to profile equalities information.

There are 1688 home seekers on the housing register for Harborough District (632 men and 1056 women)

Outcomes of consultation exercises as described in 1c above.

B. What does this information / data tell you about diverse group? If you do not hold or have access to any data/information on diverse groups, what do you need to begin collating / monitoring? (please list)

The age profile of the housing register is shown below:

Age Range	Number of Home Seekers
16-17	4
18-24	239
25-39	540
40-54	410
55-59	102
60-74	245
75+	148

The ethnic composition of the housing register is shown below:

Ethnic Origin	Number of Home Seekers
Any Other	14
Asian or Asian British Indian	8
Asian or Asian British Pakistani	2
Asian or Asian British Bangladeshi	1
Asian or Asian British Other	6
Black or Black British Caribbean	5
Black or Black British African	9
Black or Black British Other	1
Chinese	5
Gypsy	1
Irish Traveller	0
White British	1551 (91.9% of home seekers compared with 80% for England and Wales in 2011)
White Irish	5
White Any Other	50
Mixed White & Black Caribbean	10
Mixed White & Black African	0
Mixed White & Black Asian	1
Mixed Other	4

Did not declare	15
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	Number of Home Seekers
Disabled	388 (23% of all home seekers on the register)
Not Disabled	1300

Sexual Orientation	Number of Home Seekers
Bisexual	15
Gay	5
Hetrosexual	1324
Lesbian	7
Did not wish to declare	337

There are differences between the 2011 Census information for Harborough District and homeseekers on the housing register, including:

- Women represent a higher percentage of home seekers on the housing register (62.4%) compared with the general population
- Higher percentage of home seekers in age group 16-39 (46.4%) compared with the general population (31.7% of people over age 15)
- Lower percentage of home seekers in age group 40-59 (30.3%) compared with the general population (37.4% of people over age 15)
- Lower percentage of home seekers in age group 60-74 (14.5%) compared with the general population (20.7% of people over age 15)
- Slightly lower percentage of home seekers aged 75 years and over (8.8%) compared with the general population (10.2% of people over age 15)
- Slightly higher percentage of home seekers with long term health problem or disability (23%) compared with the general population (22.1%)

The information on diverse groups has helped in provide guidance on;

The minimum length of tenancy recommended for certain household groups

Expectations about issues that Registered Providers should consider in their tenancy policy such as health and wellbeing of older people, in order to minimise adverse effects

Identify the actions needed to manage adverse impacts such as appropriate information and advice services.

Review information and data held on existing tenants; those who are successful in attaining affordable housing, to assist in reviewing the equalities implications of affordable housing allocations; including fixed term tenancies and affordable rent.

Step 3 – Do we need to seek the views of others? If so, who?

<p>A. In light of the answers you have given in step 2, do you need to consult with specific groups to identify needs / issues? If not please explain why.</p>
<p>Consultation included a specific request for comments on any equality impacts of the draft Tenancy Strategy and whether it could be adapted to promote equality. The consultation has included;</p> <p>The local community, particularly those with an interest in affordable housing, including those on our housing register</p> <p>All registered providers of affordable housing within the Borough as well as the Homes and Communities Agency</p> <p>Other partner organisations, including those whose clients are likely to require access to affordable housing.</p>

Step 4 – Assessing the impacts

	<p>In light of any data/consultation/information and your own knowledge and awareness, please identify whether the policy has a positive or negative impact on the groups specified and provide an explanation for your decision. (please refer to the general duties on the front page)</p>
<p>A. Age</p>	<p>Positive impact because Tenancy Strategy says that “The following categories of tenancy should have a lifetime tenancy or a fixed term longer than five years:</p> <ul style="list-style-type: none"> ▪ Older people (60+) in designated specialist supported housing or extra care – lifetime tenancy ▪ Tenants with long term disability minimum of ten years” <p>The Tenancy Strategy supports the use of probationary tenancies which can help young people move on to secure long term affordable accommodation and provide flexibility in meeting the needs of young homeless persons.</p>
<p>B. Disability (physical, visual, hearing, learning disabilities, mental health)</p>	<p>Positive impact because Tenancy Strategy says that “The following categories of tenancy should have a lifetime tenancy or a fixed term longer than five years:</p> <ul style="list-style-type: none"> ▪ Older people (60+) in designated specialist supported housing or extra care – lifetime tenancy ▪ Tenants with long term disability minimum of ten years” <p>There is also provision for automatic renewal of fixed term tenancies other than in specific circumstances set out in page 16 of the Tenancy Strategy.</p>
<p>C. Gender / Sex</p>	<p>No specific issues However, the Tenancy Strategy says that providers</p>

	<p>must take full account of the individual circumstances of household members in their tenancy policy and provide clear concise and easily accessible information prior to tenancy allocation (including information about the housing register and housing options available to home seekers via Harborough Homesearch) and during the course of any tenancy.</p>
D. Religious Belief	<p>No specific issues However, the Tenancy Strategy says that providers must take full account of the individual circumstances of household members in their tenancy policy and provide clear concise and easily accessible information prior to tenancy allocation (including information about the housing register and housing options available to home seekers via Harborough Homesearch) and during the course of any tenancy.</p>
E. Racial Group	<p>No specific issues However, the Tenancy Strategy says that providers must take full account of the individual circumstances of household members in their tenancy policy. The Tenancy Strategy also contains provision for monitoring equality outcomes including impact on racial groups.</p>
F. Sexual Orientation	<p>No specific issues However, the Tenancy Strategy says that providers must take full account of the individual circumstances of household members in their tenancy policy and provide clear concise and easily accessible information prior to tenancy allocation (including information about the housing register and housing options available to home seekers via Harborough Homesearch) and during the course of any tenancy.</p>
G. Transgender	<p>No specific issues However, the Tenancy Strategy says that providers must take full account of the individual circumstances of household members in their tenancy policy and provide clear concise and easily accessible information prior to tenancy allocation (including information about the housing register and housing options available to home seekers via Harborough Homesearch) and during the course of any tenancy.</p>
H. Other protected groups (pregnancy & maternity, marriage & civil partnership)	<p>No specific issues However, the Tenancy Strategy says that providers must take full account of the individual circumstances of household members in their tenancy policy and provide clear concise and easily accessible information prior to tenancy allocation (including information about the housing register and housing options available to home seekers via Harborough Homesearch) and during the course of any tenancy.</p>
I. Other socially excluded groups (low literacy, priority neighbourhoods, socio-economic, etc)	<p>There are potential negative impacts because the different types of tenancy available to home seekers may be confusing for some vulnerable households, including those with low literacy levels. However, the Tenancy Strategy recommends that Registered Providers should ensure provision of clear, concise and easily accessible advice and information to tenants at all stages of their tenancy (including pre-tenancy) and set out clearly their policies about renewal or non renewal of the tenancy before a new tenant signs their tenancy agreement.</p>

J. All	Positive impact to protect security of tenure of older people and people with longer term disability. The Tenancy Strategy also contains provision for monitoring equality outcomes. Recommendation that fixed term tenancies should normally be renewed other than in specific circumstances set out in page 16 of the Tenancy Strategy and specific needs should be considered as part of renewal process. Expectation that providers be involved in meeting the needs of homeless people. Probationary tenancies can help in developing a flexible approach to meeting the needs of homeless persons and a pathway to more secure and settled accommodation.
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Step 5 – Action Plan

Please include any identified concerns/actions/issues in this action plan: <i>The issues identified should inform your Service Plan and, if appropriate, your Consultation Plan</i>			
Question Number (Ref)	Action	Responsible Officer	Target Date
	Comment on registered providers individual tenancy and affordable rent policies and equality impact assessments in order to minimise adverse impact.	Housing Needs Manager	When policies are published or reviewed
	Monitoring following outcomes: <ul style="list-style-type: none"> ▪ Numbers of relets converted from Social Rent to Affordable Rent, including sizes, types and location of homes. ▪ Analysis of new homes according to size, location, and tenancy type ▪ Affordable Rent levels compared to social rent. ▪ Priority categories of successful home seekers and through the Leicestershire CBL Scheme including monitoring of equality outcomes. ▪ Fixed term tenancies as a percentage of all social rent and affordable tenancies allocated in Harborough District ▪ Analysis of fixed term tenancies according to size/type of household and length of tenancy ▪ Percentage of fixed term tenancies not renewed and the reasons why ▪ Impact of welfare reform including the number of new tenants receiving support 	Housing Needs Manager	Annually

	with housing costs through Housing Benefit/Universal Credit; increase/decrease in rent arrears; homelessness arising from tenancy failures and repossessions		

Step 6 – Who needs to know about the outcomes of this assessment and how will they be informed

	Who needs to know (Please tick)	How they will be informed (we have a legal duty to publish EIA's)
Employees	√	Publication on the Harborough District Council website as part of public consultation(www.harborough.gov.uk)
Service users	√	Publication on the Harborough District Council website as part of public consultation(www.harborough.gov.uk) Link from Leicestershire CBL website
Partners and stakeholders	√	Publication on the Harborough District Council website as part of public consultation(www.harborough.gov.uk) Circulation to Registered Providers and other partners
Others	√	Publication on the Harborough District Council website as part of public consultation(www.harborough.gov.uk)
To ensure ease of access, what other communication needs/concerns are there?		No concerns

Step 7 – Conclusion (to be completed and signed by the Service head)

Please delete as appropriate
I agree / disagree with this assessment / action plan
If <i>disagree</i>, state action/s required, reasons and details of who is to carry them out with timescales:
Signed (Service Head):
Date:

APPENDIX B

List of Registered Providers

DeMontfort Housing Society
Derwent Housing Association
East Midlands HA
English Rural
Friendship Care and Housing A
Hanover
Housing 21
Jephson Homes Housing
Leicester Housing Association
Midlands Rural
North Memorial Homes
Nottingham Community Housing
Orbit Housing Association
Raglan Housing Association
Riverside Housing
Sanctuary Housing Association
Seven Locks Housing
Spiritia
Three Oaks Homes
Tuntum
English Churches

APPENDIX C
List of consulted organisations

DeMontfort Housing Society
Derwent Housing Association
East Midlands HA
English Rural
Friendship Care and Housing A
Hanover
Housing 21
Jephson Homes Housing
Leicester Housing Association
Midlands Rural
North Memorial Homes
North West Leicestershire DC
Nottingham Community Housing
Oadby and Wigston BC
Orbit Housing Association
Raglan Housing Association
Riverside Housing
Sanctuary Housing Association
Seven Locks Housing
Spiritia
Three Oaks Homes
Tuntum
English Churches
Starr
Charnwood Borough Council
Blaby District Council
Westleigh Development
Community Safety Officer Harborough District Council
Community Protection Officer Harborough District Council
Equality and Diversity Officer Harborough District Council