



East  
Northamptonshire  
Council

## Policy and Resources Committee – 2 July 2012

### Tenancy Strategy 2012-14

#### Purpose of report

This report seeks committee approval to adopt the Tenancy Strategy 2012-14.

#### Attachment(s)

Appendix 1: Tenancy Strategy 2012-14

Appendix 2: EIA Screening Form

#### 1.0 Background

1.1 The Localism Act proposes significant housing reform, which is intended to make the system of allocating housing fairer and more effective; and to make it easier for decisions to be taken locally.

1.2 The key features of the Act in relation to housing reform, and relevant to this council, are:

- Allocations Reform – greater freedom for local authorities to set their own policies relating to who can go onto housing waiting lists. This means, for example, that we will be able to prevent people who have little chance of ever securing affordable housing (due to low priority / need) from joining the Housing Register.
- Tenure Reform – under the previous system social landlords were only able to grant lifetime tenancies. The Act enables landlords to grant tenancies of varying length depending on people's circumstances. This section also covers the introduction of the new Affordable Rent tenancy, which has recently been incorporated into PPS3.
- Homelessness Legislation Reform – under previous rules, people who became homeless were able to refuse offers of accommodation in the private sector. The Act provides the option for local authorities to discharge their homeless duty by way of an offer of private rented accommodation, where it is deemed appropriate.

1.3 The Localism Act also requires local authorities to produce a Tenancy Strategy. The legislation requires the strategy to cover:

- What kind of tenancies to offer
- Circumstances in which the landlord will grant a tenancy of a particular kind
- Where a tenancy is set for a term, the length of term
- Circumstances where the landlord will grant a further tenancy on the ending of the existing tenancy

1.4 A draft strategy was presented to this Committee on 2 April 2012 (minute 460), and approved for a full 4 week public consultation.

#### 2.0 Consultation

2.1 A full public consultation was undertaken between 4 May 2012 and 1 June 2012. In addition, a wide range of key stakeholder organisations were contacted and asked for their views including:

- Registered Providers
- Neighbouring local authorities
- The council's Homelessness Forum
- Other key organisations such as support providers and the voluntary sector

- 2.2 The draft strategy was also placed onto the council's website.
- 2.3 Only 4 consultation responses were received; 3 of these from Registered Providers, and 1 from a local authority.
- 2.4 The comments were all very supportive, and there has been no requirement to make changes to the draft strategy as a result of the consultation.
- 2.5 The final Tenancy Strategy 2012-2014 is attached at Appendix 1.

### **3.0 Review and Monitoring**

- 3.1 This strategy is intended to provide guidance for the period 2012-2014. Officers recognise that this is a relatively short lifespan for a strategy; however, officers are also conscious that this is a brand new strategy and it will be important to closely monitor its impact and review it in a timely manner.
- 3.2 Therefore, a full review of the strategy will be undertaken in 2014, with a view to updating it where required. Before then the council may from time to time amend some aspects of the document should it be considered that this is appropriate. It is recommended that any minor amendments should be made in consultation with the Chairman of the Policy and Resources Committee, with significant amendments requiring approval by the committee as a whole. Once any amendments are made, these will be communicated fully and a revised document issued.

### **4.0 Equality and Diversity Implications**

- 4.1 It is essential that a Tenancy Strategy can ensure that a wide range of applicants' tenancy needs can be met - including those within the equality strands.
- 4.2 An Equality Impact Assessment screening has been undertaken on the strategy, which has concluded that there are no negative impacts on any of the equality groups. In several cases positive impacts have been identified. A copy of the form is attached at Appendix 2.
- 4.3 None of the consultation responses highlighted any potential equality and diversity issues.
- 4.4 The Local Government Association has recently re-launched the Social Housing Equality Framework (SHEF), to help councils and housing associations ensure that they shape their policies and strategies to meet their obligations under equalities legislation. Councils can assess their draft documents and practices against the framework, to ensure that they would not have a negative impact on any particular groups.
- 4.5 An initial screening of the strategy against the SHEF has not flagged up any concerns; however officers will be working to assess our full range of housing policies and strategies against the framework as these progress.
- 4.6 This strategy only provides guidance, however, as it will be Registered Providers who ultimately offer tenancies. Therefore in the strategy the council encourages all providers to assess their Tenancy Policies against their own Equality and Diversity frameworks, and against the SHEF.

## 5.0 Legal Implications

5.1 All local authorities are required by law to have a Tenancy Strategy in place.

## 6.0 Risk Management

6.1 There are no risks associated with the recommendation below.

## 7.0 Financial Implications

7.1 There are no financial implications associated with the recommendation below.

## 8.0 Corporate Outcomes

8.1 The production of a Tenancy Strategy contributes towards the following Corporate Outcomes:

- Good Quality of Life – Sustainable – Sustainable Development
- Good Quality of Life – Sustainable – Strong Communities
- Good Quality of Life – Healthy – Improved Housing
- Effective Partnership Working

## 9.0 Recommendation

9.1 The committee is recommended to:

1. Adopt the Tenancy Strategy 2012-14.

*(Reason: to meet the legislative requirement to have an adopted Tenancy Strategy)*

2. That authority to make minor amendments to the Tenancy Strategy be delegated to the Housing Strategy Manager, subject consultation with the Chairman of the Policy and Resources Committee.

*(Reason: to ensure that there is Member involvement and oversight of any minor amendments to the strategy.)*

<b>Legal</b>	Power: Localism Act 2011				
	Other considerations:				
<b>Background Papers:</b>					
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East  
Northamptonshire  
Council

## Draft Tenancy Strategy for Consultation



2012-2014

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## Change History

Issue	Date	Comments
0.1	Feb 2012	Draft created for Housing Policy Working Party to work on
0.2	March 2012	Second draft incorporating amendments by the Working Party
0.3	April 2012	Third draft incorporating amendments by Policy and Resources Committee
1.0	July 2012	Final Version

*NB: Draft versions 0.1 - final published versions 1.0*

## Consultees

Internal	External
Housing Policy Working Party	Registered Providers
CMT	North Northants LAs
Private Sector Housing	HCA

## Distribution List

Internal	External
All staff and Members	As above, also to be placed on website.

## Links to other documents

Document	Link
Housing and Homelessness Strategy	Currently in draft form

## Additional Comments to note

Although this strategy will be formally reviewed in 2014, there will also be ongoing review of the data which may result in some amendments being made before then.

## Contents

	<b>Page</b>
<b>1.0 Introduction</b>	<b>5</b>
<b>2.0 East Northamptonshire Profile</b>	<b>5</b>
<b>3.0 Background and Scope</b>	<b>6</b>
<b>4.0 Housing Market</b>	<b>8</b>
<b>5.0 Guidance for Registered Providers</b>	<b>12</b>
<b>6.0 Consultation and Communication</b>	<b>18</b>
<b>7.0 Review and Monitoring</b>	<b>19</b>
<b>8.0 Equality &amp; Diversity</b>	<b>19</b>
<b>9.0 Contacts</b>	<b>20</b>
<b>10.0 Glossary</b>	<b>21</b>
<b>11.0 References</b>	<b>22</b>
<b>Appendices:</b>	
Appendix 1 – Registered Providers with Stock	<b>23</b>
Appendix 2 – Affordable Housing Stock Profile	<b>28</b>
Appendix 3 – List of Consulted Organisations	<b>29</b>
Appendix 4 – Consultation Questions & Feedback Pro-forma	<b>30</b>

## 1.0 Introduction

The Localism Act<sup>1</sup> sets out a number of key proposals which are relevant to housing; including changes to allocations, tenure reform, changes to homelessness legislation, and reform of council housing finance.

The Localism Act also requires local authorities to produce a Tenancy Strategy. East Northamptonshire Council does not own or manage any housing and therefore the Tenancy Strategy is intended to provide guidance for Registered Providers working within the district when framing their own policies.

Building on our established and strong working relationships, this strategy has been developed collaboratively between the council and our Registered Providers (RPs) and other key stakeholders. In developing this strategy we have had regard to our Allocation Scheme (currently under review) and draft Housing and Homelessness strategy.

## 2.0 East Northamptonshire Profile

### 2.1 Profile of the district

East Northamptonshire is one of seven districts/boroughs within the county of Northamptonshire. It is predominantly rural, with widely differing characteristics in the North and South.

The North is made up of a network of small villages, served by larger settlements and the market towns of Oundle and Thrapston. The South has more of an urban feel and includes the remaining four towns of Rushden, Higham Ferrers, Irthlingborough and Raunds.

The population of the district is approximately 87,000<sup>2</sup>; with Rushden the largest town of around 29,500 residents. There are approximately 36,800 households in the district.

There is good access to road links, in particular the A14 which provides links to the M1, A1 and A45 among others. There are mainline railway station services from Kettering, Wellingborough and Peterborough, and a new station at Corby.

In terms of deprivation, East Northamptonshire is ranked 269<sup>th</sup> out of 354 local authority areas<sup>3</sup>; where 1 is the most deprived and 354 the least deprived. In the whole it is a reasonably affluent district. However, there are pockets of deprivation in some of the towns; and there is also an element of rural isolation given the geographical nature of the area.

The average property price for East Northamptonshire is £189,353, and typically costs 8 times the average income. The district is ranked 13<sup>th</sup> out of the East Midlands' 18 rural areas in terms of affordability; with number 1 being the most expensive and number 18 being the least.

The district contains some important natural features, including a Ramsar area (an area of outstanding natural interest of European Quality) and beautiful countryside, making it the perfect place to enjoy days out. Therefore tourism is very important to the area; and in particular local businesses. Some of the attractions include Stanwick Lakes, the River Nene; together with country parks, museums and stately homes.

Detail on the profile of the housing stock in the district is provided later on the document.

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<sup>1</sup> Formerly the Localism Bill

<sup>2</sup> All population figures are 2010 estimate.

<sup>3</sup> Indices of Deprivation 2007



## 2.2 Corporate vision and priorities

Despite the current economic challenges, the council remains ambitious and wants to ensure that the district thrives and prospers. Three of the four key priorities agreed for the next four years are relevant to this strategy:

- **Sustainable development** – the demand for housing in this area has not gone away. We recognise the need for growth and the benefits it can bring, particularly in helping to revitalise our town centres, but it must be sustainable. We will aim to accommodate sensible levels of growth while preserving the character of our historic towns and villages.
- **Regeneration and economic development** – allied to growth must be improvements to the quality of our town centres. We will work with the private sector to bring investment into the area and to reverse the decline of some of our towns, particularly Rushden. We will continue to consult local communities about the changes that they want to see and work with them to achieve their aspirations for their local area.
- **Customer-focused services** – many of our residents and businesses routinely use the internet and we will upgrade our website significantly to provide better quality information and to enable far more transactions to be carried out online. We will also work even more closely with our partners, particularly the County Council, to meet the needs of the most vulnerable members of our community.

The council's Corporate Plan takes these priorities forward and develops them into a set of priority outcomes that we are committed to deliver. The priority outcomes relevant to this strategy are:

- Sustainable development
- Strong communities
- Improved housing
- Strong strategic partnerships

The full Corporate Plan can be viewed at [www.east-northamptonshire.gov.uk/corporateplan](http://www.east-northamptonshire.gov.uk/corporateplan)

The council's vision for this strategy, taking into account the priorities above, is that it should ultimately seek to establish two key principles:

- A broad and appropriate range of tenure types across the district which can provide residents with settled homes for as long as they need them.
- The best use of the affordable housing stock within the district.

## 3.0 Background and Scope

### 3.1 Government Policy

The Government's key housing policy objective is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking to:

- achieve a wide choice of high quality homes, both affordable and market housing, to address the requirements of the community,
- widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need,

- improve affordability across the housing market, including by increasing the supply of housing and;
- create sustainable, inclusive, mixed communities in all areas, both urban and rural.

### 3.2 Localism Act

The Localism Act includes new powers relating to allocations and flexible tenancies; it requires local authorities to produce a Tenancy Strategy that sits alongside the Housing Strategy, Homelessness Strategy and Allocations Policy.

The legislation requires the Strategy to cover:

- What kind of tenancies to offer
- Circumstances in which the landlord will grant a tenancy of a particular kind
- Where a tenancy is set for a term, the length of term
- Circumstances where the landlord will grant a further tenancy on the ending of the existing tenancy

### 3.3 Delivery of New Homes

Along side the requirements of the Localism Act, the Homes and Community Agency (HCA) is working to agree programmes for the delivery of new affordable housing over the next 4 years with RP's. All new homes built with HCA subsidy are expected to be offered at 'affordable rents': i.e. at up to 80% of the market rent. In addition RP's are offering to increase rents on a percentage of re-let properties – these are referred to as 'conversions'.

RP's are also encouraged by the HCA to take a more proactive approach to managing their stock, including disposal of stock where this will bring funds to invest in new homes.

### 3.4 Tenure Options

RPs who have entered into a contract with the HCA to deliver new homes will be able to offer a range of different tenancy types including:

- Fixed term tenancies for a minimum of 2 years (although the Government has stated that only in exceptional cases will the term be less than five years).
- Life time tenancies

Where RPs are receiving grant, it is expected by the HCA that they will be charging affordable rents on new properties and conversion of some of their existing stock.

RPs who are not developing or developing without HCA resources can continue to offer assured lifetime tenancies at social rent levels. RPs will continue to be able to offer introductory tenancies whether in receipt of grant or not.

It is expected that nomination arrangements will remain unaffected and that lettings will continue through existing arrangements which for most areas, including East Northamptonshire, is via choice based lettings.

Existing tenants who remain in their existing homes will not be affected by affordable rent proposals unless they transfer to another property – in which case their security will remain the same but their rent may change.

### 3.5 Mobility in social housing (moving house)

The Localism Act promotes mobility in social housing, which essentially means making it easier for tenants to move home should their circumstances change i.e. they need to move to be closer to work. The Act includes extending existing powers of the Secretary of State and the regulator to give directions to include methods of assisting tenants to exchange tenancies, such as introducing flexible and fixed term tenancies for example.

### 3.6 Scope of this strategy

Taking all of this into account, this strategy provides guidance on the following:

- Housing affordability levels for the district
- Flexible tenure including review requirements
- Needs of specific groups
- Delivery of Affordable Rent
- Conversions to Affordable Rent
- Mobility
- Disposal of stock
- Local lettings policies
- Discharge of homeless duty into the private sector

## 4.0 Housing Market

### 4.1 Stock profile

The housing stock 2010 estimate shows East Northamptonshire as having 38,831 dwellings. Of these, 5100 (14%) are affordable housing properties (social rent, intermediate rent or shared ownership/homebuy) and the remainder are owner occupied or privately rented.

The council does not have any housing stock, having transferred it all in 2001 via a large scale voluntary transfer. All of the affordable housing in the district is owned and managed by RPs, and a full list of those with stock in the district is attached at Appendix 1.

The table below shows a summary of affordable housing properties by size:

	<b>1 bed</b>	<b>2 bed</b>	<b>3 bed</b>	<b>4 bed</b>	<b>5 bed</b>	<b>Extra Care</b>
<b>Number of properties</b>	1136	1875	1974	74	0	41

There are many different types of properties within each size bracket, and the full stock breakdown is provided at Appendix 2.

The number of social housing re-lets for 2010/11 was 416. On average for each property advertised there are around 12 people applying for each property; however this can vary considerably from no applications for hard to let properties to over 50 applications for very popular properties (such as family housing).

National data shows a median stay of 7 years in a social tenancy, compared to 11 years for an owner-occupier and 1 year for a private renter (from EHS 2008/9).

## 4.2 Housing register profile

As at January 2012, there were 1208 households on the councils housing register (waiting list). This has increased slightly since the same time last year when there were approximately 1100. Applicants are placed into bands according to need; ranging from Band 1 which contains the households in the most housing need (such as homeless households), to Band 4 which contains the households in the least housing need. Applicants in Bands 2 and 3 have varying reasons for requiring accommodation such as being overcrowded or needing to move on from supported accommodation.

The breakdown of households in these bands is as follows:

Priority Card (most urgent)	20
Band 1	36
Band 2	122
Band 3	683
Band 4	347
Total	1208

Applicants in Band 4 are either not living within the district, or are not generally considered to have a housing need – for example they may have sufficient means to rent privately or may own a property which is reasonable for them to occupy.

Therefore there are 861 households on the waiting list within the district who are in some degree of housing need.

Almost a third of the households on the housing register have at least one applicant who is over 60. This is higher than in the general population figures for East Northamptonshire which show that approximately 23.8% of those living in the district are of this age<sup>4</sup>. This is unsurprising though when considering that the many of the reasons for requiring re-housing – ie needing to downsize, requiring an adapted property, or wanting to move close to a carer or family support – are associated with getting older.

Population projections<sup>5</sup> show that in East Northamptonshire, as is the case nationally, the population is getting older. It is estimated that in 2011 there were 14,700 people aged 65 and over, and this is projected to rise to 26,400 by 2030.

When making a housing application, households are given the opportunity to present information relating to any medical or social needs – ie are they vulnerable or do they have particular needs. This information is then considered by either a Medical or Social Need Panel to determine whether the applicant should be given any additional housing priority.

In 2011, 176 medical assessments were made and 47 social need assessment were made. Not all of these resulted in additional priority; however this is a good indication of the number of

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<sup>4</sup> 2010 mid-year population estimate

<sup>5</sup> Projecting Older People Population Information System

households that have some sort of special need – even if it is a mild one. In total 223 applicants were assessed, which is 18% of those on the housing register.

The information above shows that there are a significant number of older households, and households with some sort of special need, on the housing register. It is important to take this into consideration when determining what type of tenancies are more appropriate for the district.

The table below shows the breakdown of housing register applicants by age:

Age Bracket	Number of applicants
16-20 years	90
21-30 years	244
31-40 years	211
41-50 years	186
51-60 years	144
61-70 years	201
71-80 years	84
81-90 years	39
90+	9
<b>Total</b>	<b>1208</b>

### 4.3 Income data

The table below shows the mean (average), median (middle), and mode (most frequent/common) income levels for East Northamptonshire.

Total Households	36,334
Mean Income	38,560
Median Income	30,493
Mode Income	12,500

The average income shown above is slightly higher than the surrounding North Northants area (also including Kettering, Corby and Wellingborough).

Whilst this information is useful, it should be used with caution. East Northamptonshire has some affluent rural areas which is reflected in the fact that there are more households in very high income brackets (£100,000 per annum plus) than the rest of the North Northants area. The mode income of £12,500 is the same as the other three local authorities which shows that in addition to the high earners, there are as many households with a low income as the surrounding areas.

### 4.4 Rents and affordability

#### Private Rents

Average private rents for the district are shown in the table below:

	1 bed flat	2 bed flat	2 bed house	3 bed house	4 bed house	5 bed house
Average monthly rent	£419	£471	£534	£623	£942	£1128

Average weekly rent	£97	£109	£123	£144	£217	£260
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These figures have been calculated using a sample of advertised rents from November 2011, from settlements across the district, and are therefore intended as a guide rather than as absolute levels.

### Social Rents

Details of average social rents across the district are shown in the table below. Again the rent levels have been calculated by taking a sample of advertised vacant properties from May 2011 to November 2011, and calculating the average rent for each property type. As with the private rent figures, this is intended as a guide.

	1 bed flat	2 bed flat	2 bed house	3 bed house	4 bed house	5 bed house
Average monthly rent	£330	£378	£387	£413	£461	n/a*
Average weekly rent	£76	£87	£89	£95	£106	n/a*

\* There are no 5 bedroom social housing properties in the district

### Affordable Rents

As set out above, RPs receiving grant from the Homes and Communities Agency are now able to provide affordable housing at 'affordable rent' levels; which are capped at no more than 80% of market rent. The predicted affordable rent levels for the district are set out below, which are estimated using the first table above and applying the 80% level:

	1 bed flat	2 bed flat	2 bed house	3 bed house	4 bed house	5 bed house
Average monthly rent	£335	£377	£428	£499	£753	£902
Average weekly rent	£77	£87	£98	£115	£174	£208

It can be seen from these figures that there is very little difference in the rent levels between affordable rents and social rents for smaller properties. It is not until we consider 3 bed dwellings and larger that there is any noticeable difference. Therefore the delivery of new smaller affordable rented dwellings is not likely to create any affordability problems.

We do not anticipate thought that RPs will be seeking to deliver smaller units as Affordable Rent, such as flats, due to the lack of additional revenue that this would create.

Further information on the affordability of affordable rent levels, and the councils view on the delivery of affordable rent, is set out at 5.3 below

## Affordability

Affordability of housing costs is very difficult to measure, as what is affordable to some households may not be affordable at all to others.

It is generally accepted that housing costs should not represent more than around a third of a household's income in order to be sustainable and affordable. This is roughly in line with the level that mortgage providers will lend at, and is consistent with the guidance given by CLG for undertaking strategic housing market assessments – they state that 3.5 times income for single income households and 2.9 times income for dual income households should be used.

The council is of the view that when offering new tenancies to applicants, RPs should carefully consider whether the housing costs (rent, service charge, etc) are truly affordable for the applicant. For example, is the applicant on housing benefit? If so, does this cover all of their housing costs? If not, then can they afford the top up? All these important issues should be covered prior to tenancy sign-up to ensure that we are not setting households up to fail.

Affordability is very important when considering where, and at what level, the new Affordable Rent product should be delivered. More on this is set out at section 5.3 below.

## 5.0 Guidance for Registered Providers

### 5.1 Definition of affordable housing and affordability

#### Affordable Housing

Essentially affordable housing is housing provided at below market cost, either through renting or by a mixture of renting and buying part of the property, the latter is more commonly known as 'shared ownership' or 'homebuy'.

The National Planning Policy Framework, published in March 2012 contains the following definition of affordable housing:

"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), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Homes and Communities Agency.

Affordable rented housing is let by local authorities or private 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."

## 5.2 Flexible tenure

We accept that RPs may want to take advantage of the new provisions enabling fixed term tenancies to be issued. We also acknowledge that the decision to use fixed term tenancies, and the length of these tenancies, lies with the registered provider. However we would strongly encourage RPs to consult with the council on their proposed tenancy policies before these are adopted and issued.

Where fixed term tenancies are issued, we suggest that the following basic principles are adopted as a minimum:

- A minimum of a five year fixed term tenancy for most households. There are some households for whom we would prefer a longer tenancy and there are some exceptional circumstances where we are prepared to accept a shorter term (these are described later at 5.3). Where a term of less than five years is proposed we expect providers to discuss this with us at the earliest opportunity as it will have implications for the council's allocations policy.
- For fixed term tenancies to be re-issued at the end of the term unless there is a significant change of circumstance. We would like the opportunity to work with providers to establish the criteria they use to inform this decision.
- That fixed term tenancies are not used as a general management tool. We are of the view that there are other more suitable existing tools, such as introductory tenancies, available to providers to manage the risk of future breaches of tenancy agreements..
- Clear and concise advice and information is provided to tenants at all stages – see below.

The table below sets out what we expect providers to offer to tenants before they issue a fixed term tenancy, during the tenancy, and prior to the end of a fixed term tenancy:

<b>Prior to issue</b>
Timely information and advice services to help people understand their housing options which should include, where appropriate, opportunities to move within and outside the social and affordable rent sectors eg, into market rent or home ownership (including low cost).
Clear criteria against which the decision to re-issue the tenancy at point of review will be made.
<b>During tenancy</b>
Tenancy support, for example help with financial planning
Referral to external support agencies where required
Period reviews to monitor any change in circumstances
<b>Prior to end of fixed term period</b>
A clear and transparent review process which is understood by the tenant at the time of tenancy sign up



Information sharing between registered providers and the council when the decision not to reissue a tenancy has been taken, provided 6 months before the tenancy ends, so as to avoid homelessness

If a fixed term tenancy is issued, we expect that a full review will be undertaken prior to the beginning and end of the tenancy period. It is accepted that occurrences where tenancies are not renewed are likely to be the exception and not the rule; due to the fact that for the majority of social housing tenants their circumstances will not change considerably over time.

Towards the end of a fixed term tenancy, there are a number of courses of action which providers can take:

- (1) To re-issued a new Fixed Term Tenancy; or
- (2) For the tenant to remain in the property but on new terms; or
- (3) To assist the tenant to find alternative (and more suitable) accommodation; or
- (4) Not offer any other form of tenancy

There are a number of situations where we accept that it may not be appropriate to re-issue a further fixed term tenancy. These include where:

- The property is adapted and no-one residing at the property requires the adaptations
- The property is under-occupied by more than one bedroom
- The property is over-crowded
- The financial circumstances of the tenant have changed to such an extent that other housing options would be more appropriate.
- Breaches of tenancy or tenancy fraud are identified during the fixed term tenancy review process.
- The tenant and/or their advocate do not engage in the fixed term tenancy review process.
- The tenant comes into legal ownership of another home or property.
- The tenants behaviour during the fixed term of the tenancy has been unacceptable to the extent that they would not be accepted onto the council's housing register – for example sustained and documented anti-social behaviour.
- There is a strong need for the tenant to move to another location, for example to take up employment.

This list is not exhaustive, and there may be other circumstances where the re-issue of a tenancy would not be appropriate.

Where a Fixed Term Tenancy is coming to an end and a notice has been served, the council expects providers to ensure that tenants receive housing options advice; either provided directly or co-ordinated via the council's housing options team.. This will ensure that they are aware of the different housing options available to them given their particular circumstances and can access appropriate support.

Any decision to not renew a fixed term tenancy should take full account of the likelihood of re-housing. If RPs are not transferring a tenant to another property within their own stock, then we expect that a full consultation with the council's housing options team will take place to ascertain whether suitable properties are available, what the likely re-housing time is, and other relevant factors.

We would also highlight the need to work actively with tenants well before their fixed term tenancy is due to come to an end.

### 5.3 Needs of specific groups

There are some groups for which the type of tenancy they are issued will have more of an impact. We have set out below the groups for which we feel that special consideration would be beneficial, and guidance on the types of tenancies that we would prefer providers to consider.

#### **Families with children of school age or younger**

Our preferred tenancy terms are:

- A minimum of a five year fixed term tenancy

Security and stability during a child's education is critical. Families also rely on nearby friends and relatives to provide care for their children. We expect these factors to be considered by providers in reaching a decision about the use of fixed term tenancies for this household group.

#### **Households with a disabled member or member with special needs**

Our preferred tenancy terms are:

- For fixed term tenancies to be used where this will enable the best use of adapted stock
- A minimum ten year fixed term tenancy where it is likely that the disabled person will remain living in the property for some time and still require the adaptations

We recognise that in certain circumstances, where the applicant has life long conditions, an assured (lifetime) tenancy may be appropriate. Shorter tenancies may be deemed appropriate by providers and their health and care partners in some situations; for example we acknowledge that a two year tenancy in an adapted home may be deemed appropriate where a household member has a recoverable injury/condition and is fully expected to move on into a non-adapted home. It may also be appropriate for shorter tenancies (of not less than five years) to be used where there is an adapted family home and the needs of the disabled child may change, or the child may move out.

#### **Older people over the age of 60**

At this stage our preferred tenancy terms, are:

- A minimum of a five year fixed term tenancy for older people living in general needs accommodation
- Lifetime tenancies for older people living in sheltered housing (accommodation designated specifically for older people)

In deciding on the use of fixed term tenancies for this household group, or for accommodation that is specific to older people eg, sheltered, we would like providers to consider health and wellbeing, the role of friends and relatives in enabling independence, and the possibility that insecurity of tenure may add to someone's worries about their future.

We are particularly interested in working with providers to explore how under-occupation of family homes can be addressed; and this will be taken forward through our review of our housing allocation policy.

We would also ask that RPs give special consideration to the following when developing their policies:

- Households in rural areas
- Single households under 35

We are aware that we either currently have, or expect to have, problems in re-housing these households due to a lack of supply of affordable housing.

As the full impact of the Welfare Reform becomes known, there may be other groups who experience specific re-housing problems. We will monitor this and update this strategy as and when required.

#### 5.4 Delivery of Affordable Rent

The council welcomes the delivery of new Affordable Rented housing where this can enable development to proceed through harnessing grant.

We are undertaking modelling, using income data, to obtain an idea of what income levels are required for applicants to be able to access Affordable Rented housing where they are not claiming full housing benefit. This information will be used to inform our required tenure on new developments, and our response to conversion requests.

The provision of Affordable Rent through new developments will be considered on a site by site basis. It is not possible for us to publish broad guidelines for the district due to a number of factors:

- The ability of Affordable Rent to meet housing needs in specific areas
- Specific requirements for other tenure, such as Social Rent, in areas
- The developing or receiving RP for the units (not all RPs can deliver Affordable Rent – see 3.4 above)
- Any specific local circumstances which may require the delivery of a certain tenure mix, such as housing management problems
- Factors specific to individual developments, such as viability.

Where homes are in settlements of less than 3,000 population (villages), we expect providers to deliver products which meet the requirements as set out in the local housing needs survey. Where a survey does not exist, we can provide local housing needs information based on analysis of a number of different data sources.

It is expected that Affordable Rent levels will be no more than 80% of market rent, and should not exceed the Local Housing Allowance for the relevant area.

Further guidance on the provision of Affordable Rent will be provided in our new Housing and Homelessness Strategy due out in late 2012.

#### 5.5 Conversions to Affordable Rent

The council accepts the need for RPs to set targets for converting existing affordable housing stock to Affordable Rented housing, in order to generate funding.

Where RPs are considering conversions, we would urge that early discussions take place with the council to ensure that these take place where they can be sustained and where they are affordable.

We would not wish to see any RP convert more than 50% of their stock to Affordable Rent, as there remains a considerable need for social rented housing as detailed at 5.3 above.

## 5.6 Mobility

The council recognises the need for mobility within the affordable housing sector. Enabling tenants to be able to move can help them secure better employment and be close to family networks; and can also help with the supply of affordable housing, for example by 'freeing-up' properties for others.

The process for moving within the sector, and information on how we can assist people to move quickly and easier, can be found in our Housing Allocation Policy :

[www.east-northamptonshire.gov.uk/allocationspolicy](http://www.east-northamptonshire.gov.uk/allocationspolicy)

In addition to the housing allocation process, we also welcome the use of other initiatives which make it easier for those wishing to move to do so – such as mutual exchange programmes or 'management moves' within RP stock where appropriate.

## 5.7 Disposal of stock

The council in general terms would not wish to see the disposal of housing stock, however, it is recognised that in certain circumstances this may be justifiable providing it allows for future investment within the district in more appropriate housing.

We would ask that RPs consult with us before disposing of any stock, so that we have the opportunity to discuss the individual situation.

## 5.8 Local lettings policies

Local lettings policies (LLPs) can be very useful in maintaining sustainable communities, and for addressing specific housing management problems. However we also recognise the need for tenants to be able to exercise an element of choice over where they want to live, and that mobility is important – for example in maintaining a dynamic labour market.

Therefore we propose to introduce and implement LLPs on a development-by-development basis; where it is agreed between the council, stakeholders and communities that they would be useful.

## 5.9 Discharge of homeless duty into the private sector

The Localism Act changed to the duty to accommodate which is owed by local authorities to households assessed as statutorily homeless. Local authorities will be able to discharge their duty to homeless households with an offer of suitable accommodation in the private rented sector if they so wish, provided that the tenancy is for a minimum of one year.

Currently this option is already available to local authorities but only with the agreement of the household. The new provision will enable local authorities to discharge their duty into the private

sector if they feel that the household's circumstances mean that it is reasonable to do so. For example not all households will automatically need a social home for life but under the previous legislation they could acquire one which would leave others waiting.

This new flexibility may also enable local authorities to better manage their temporary accommodation costs and bed and breakfast costs.

Determining factors when considering whether to make use of this new power are:

- The circumstances of each individual homeless household / applicant
- The availability of affordable, good quality private rented accommodation
- Any current problems in discharging homeless duty

East Northamptonshire council does not generally experience problems discharging our homeless duty in an appropriate and timely way. As at February 2012 there are 24 applicants on our housing register with a 'priority card'. These are the most urgent re-housing cases and include those that we have accepted a duty to.

There are approximately 1200 households on the housing waiting list, and so the most urgent applicants only represent 2% of those seeking accommodation. We can therefore conclude from this that only a relatively small number of affordable properties are needed each year to fulfil our duty.

It can at times be difficult or take longer to discharge our duty to households wishing to remain or live in the rural north of the district, due to the lower availability of accommodation. Therefore the new flexibilities would prove useful in these situations as an example.

We will consider whether to make use of the new power on a case by case basis as appropriate, depending upon specific circumstances. This is similar to the approach taken at present. We would be very reluctant to 'force' any households to take up an offer of accommodation that they did not want, unless we felt that they were being particularly unreasonable.

## 6.0 Consultation and Communication

We have sought to consult important stakeholder organisations and RPs , plus the Homelessness Forum on this document. Comprehensive consultation **has been undertaken which closed on the 1 June**. A full list of organisations consulted is provided at Appendix 3. In addition the draft strategy has also been placed on the council's website for this period, inviting wider public consultation.

A list of consultation questions is attached at Appendix 4, to help to provide us with structured and specific feedback, along with a feedback pro-forma. In addition to the specific questions there is some space on the pro-forma for general comments, thoughts and observations.

We will use the results of the consultation exercise to further shape and refine this strategy, resulting in a final document.

We welcome feedback at any time on this document, and contact details are provided below for this.

## 7.0 Review and Monitoring

This strategy is intended to provide guidance for the period 2012-2014. We recognise that this is a relatively short life span for a strategy; however we are also conscious that this is a brand new strategy and it will be important to closely monitor its impact and review it in a timely manner.

Therefore a full review of the strategy will be undertaken in 2014, with a view to updating it where required. Before then we may from time to time amend some aspects of the document should we feel that this is appropriate. If any amendments are made, these will be communicated fully and a revised document issued.

## 8.0 Equality and Diversity

It is essential that a Tenancy Strategy can ensure that a wide range of applicant's tenancy needs can be met - including those within the equality strands. The six "Equality Strands" are:

- Age
- Disability
- Gender (including transgender and pregnancy and maternity)
- Race
- Religion/belief
- Sexual orientation

As a mainly rural authority we are also taking steps to reduce disadvantage caused by rural isolation and social exclusion.

We want to ensure that this strategy incorporates action to make access to housing fair and equal, and for vulnerable people to be able to live independently, particularly:

- Older people
- People with a disability
- Vulnerable people
- People fleeing domestic abuse
- Young people
- Households at risk of homelessness

This strategy has been subject to an Equality Impact Assessment screening process to ensure that there are no potential negative impacts on any of the equality groups. This process concluded that there are no perceived negative impacts, and that in some cases there are positive impacts for some groups.

The Local Government Association has recently re-launched its Social Housing Equality Framework (SHEF); to help councils and housing associations ensure that they shape their policies and strategies to meet their obligations under equalities legislation. Councils can assess their draft documents and practices against the framework, to ensure that they would not have a negative impact on any particular groups.

An initial screening of the strategy against the SHEF has not flagged up any concerns; however we will be working to assess our full range of housing policies and strategies against the framework as these progress.

This strategy only provides guidance however, as it will be Registered Providers who ultimately offer tenancies. Therefore we would encourage all providers to assess their Tenancy Policies against their own Equality and Diversity frameworks, and against the SHEF.

## 9.0 Contacts

For further information or discussion on any aspect of this document, please contact:

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East Northamptonshire Council  
Cedar Drive  
Thrapston  
Northamptonshire  
NN14 4LZ

Tel: 01832 742078  
[Chartley@east-northamptonshire.gov.uk](mailto:Chartley@east-northamptonshire.gov.uk)  
[www.east-northamptonshire.gov.uk](http://www.east-northamptonshire.gov.uk)

## 10.0 Glossary of terms

Term	Definition
Adapted Property	A property adapted to enable a person or household with a special requirement to live there – such as a disabled person
Allocation Scheme / Allocation Policy	A process by which local authorities allocate affordable housing
Grant	Funding provided by the Government to provide new affordable housing
Homes and Communities Agency	The organisation that funds new affordable housing, and regulates Registered Providers
Housing and Homelessness Strategy	A strategy setting out the council's plans under the topics of housing and homelessness
Housing Options Team	The council front line housing advice and homelessness team
Introductory Tenancy	A short-term tenancy which enables the landlord and tenant to monitor progress
Local Lettings Policy	A lettings agreement for a certain property, or group of properties, or area which specifies the terms and criteria under which properties will be let
Registered Provider	A landlord registered with an regulated by the Homes and Communities Agency, usually offering mostly affordable housing
Strategic Housing Market Assessment	An assessment of the housing market and housing need in a given area
Temporary Accommodation	Accommodation of various types intended to be occupied for a temporary period, whilst settled accommodation is being sought
Tenancy Strategy	Described at paragraph 3.2



## 11.0 References

In producing this strategy we have spoken to registered providers and other local authorities; and read many other strategies and policies. We would like to acknowledge the following organisations whose documents and ideas have helped to shape our own.

Spire Homes  
Midland Heart  
North West Leicestershire District Council  
St Edmundsbury Borough Council  
Housing Vision  
Kettering Borough Council

## Appendix 1 – Registered Providers

The following is a full list of all Registered Providers in the district with affordable housing stock, and the number of units they own.

### **Accent Nene Housing Association**

Manor House  
57 Lincoln Road  
Peterborough  
PE1 2RR  
Tel: 01733 295400  
Website: <http://www.accentgroup.org/nene/Pages/default.aspx>  
19 units

### **Aragon Housing Association**

Katherine's House  
Dunstable Street  
Amphill  
Bedfordshire  
MK45 2JP  
Tel: 01525 840505  
Website: <http://www.aragon-housing.co.uk/>  
39 units

### **Bedfordshire Pilgrim Housing Association**

Pilgrims House  
Horne Lane  
Bedford  
MK40 1NY  
Tel: 01234 328828  
Website: <http://www.bpha.org.uk/>  
32 units

### **De Montfort Housing Association**

33 Millstone Lane  
Leicester  
LE1 5JN  
Tel: 0116 2233700  
Website: <http://demontforhousing.co.uk/main.cfm>  
37 units

### **East Midlands Housing Association**

Memorial House  
Stenson Road  
Coalville  
Leicestershire  
LE67 4J  
Tel: 0844 892 0112  
Website: <http://www.emha.org/>  
67 units

**Genesis Housing**

The Malthouse Project  
97 Risbygate Street  
Bury St Edmunds  
IP33 3AA  
Tel: 01284 732550  
Website: <http://www.genesisha.org.uk/>  
18 units

**Housing 21**

9 Avro Court  
Ermine Business Park  
Huntingdon  
PE29 1TDG  
Tel: 0807 192 4000  
Website: <http://www.housing21.co.uk/>  
27 units

**Hyde Minister Housing Association**

Jubilee House  
92 Lincoln Road  
Peterborough  
PE1 2SN  
Tel: 01733 349800  
Website: <http://www.hyde-housing.co.uk/>  
21 units

**Jephson Homes Housing Association**

5 Mill Square  
Featherstone Road  
Wolverton Mill South  
Milton Keynes  
MK12 5ZD  
Tel: 01908 226555  
Website: <http://www.jephson.org.uk/>  
23 units

**Leicester Housing Association**

3 Bede Island Road  
Leicester  
LE2 7EA  
Tel: 0116-2576700  
Website: <http://www.lha.org.uk/Pages/Default.aspx>  
58 units

**Metropolitan Housing**

Raleigh House  
68-84 Alfreton Road  
Nottingham

NG7 3NN

Tel: 0845 6015042

**Midland Heart Housing Association**

20 Bath Row

Birmingham

B15 1LZ

Tel: 0870 6070300

Website: <http://www.midlandheart.org.uk/>

188 units

**Midsummer Housing Association**

Henshaw House

851 Silbury Boulevard

Milton Keynes

MK9 3JZ

Tel: 01908 609577

Website: <http://www.guinnesspartnership.com/about-us/about-guinness-south.aspx>

4 units

**Northamptonshire Rural Housing Association**

Whitwick Business Centre

Stenson Road

Coalville

Leicestershire

LE67 4JP

Tel: 01530 276545

Website: <http://www.northamptonshirerha.org.uk>

62 units

**Orbit Housing Association**

3 Brookfield

Duncan Close

Moulton Park

Northampton

NN3 6LL

Tel: 0845 850 2050

Website: <http://www.orbit.org.uk/main.cfm>

405 units

**Place for People**

15 Sassoon Mews

Wellingborough

Northamptonshire

NN8 3LT

Tel: 01933 401316

Website: <http://www.placesforpeople.co.uk/>

8 units

**Riverside ECHG**

89/91 Duck Street  
Rushden  
Northamptonshire  
NN10 9SF  
Tel: 01933 419240  
Website: <http://www.riverside.org.uk/national.aspx>

11 units

**Raglan Housing Association**

4 Stephenson Court  
Fraser Road  
Priory Business Park  
Bedford  
MK44 3LH  
Tel: 0845 070 7772  
Website: <http://www.raglan.org/main.cfm>

8 units

**Rockingham Forest Housing Association**

St. Peter House  
101 Wellingborough Road  
Rushden  
Northamptonshire  
NN10 9YL  
Tel: 01933 411400  
Website: <http://www.rfha.org.uk/>

618 units

**Sanctuary Housing Association**

164 Birmingham Road  
West Bromwich  
B70 6QG  
Tel: 0121 5253131  
Website: <http://www.sanctuary-group.co.uk/housing/Pages/home.aspx>

4 units

**Spire Homes**

1 Crown Court  
Crown Way  
Rushden  
Northamptonshire  
NN10 6BS  
Tel: 0300 123 6611  
Website: <http://www.spire-homes.org.uk/>

3345 units

**Viridian Housing**

Viridian House  
St. Katherine's Terrace  
Northampton

NN1 2AX  
Tel: 01604 745100  
Website: <http://www.servite.co.uk/>  
94 units

## Appendix 2 - Affordable Housing Stock Profile

### Sheltered Housing:

Property Type	Sheltered Bedsit	Sheltered 1 bed flat	Sheltered 2 bed flat	1 Bed Bungalow	2 Bed Bungalow	3 Bed Bungalow
Number of Properties	36	183	37	349	566	23

Property Type	Extra Care Flats	Bedsit
Number of Properties	41	39

### General Needs:

Property Type	1 Bed Flat	2 Bed Flat	3 Bed Flat	1 Bed Maisonette	2 Bed Maisonette	3 Bed Maisonette
Number of Properties	504	508	3	4	1	21

Property Type	1 Bed House	2 Bed House	3 Bed House	4 Bed House	5 Bed House	Unknown Property Type
Number of Properties	12	763	1927	74	0	9

## Appendix 3 – List of Consulted Organisations

This strategy was placed onto the council's website enabling full public consultation. In addition, the following organisations were all specifically asked for their views/comments.

All housing associations with stock (see Appendix 1)

All other local authorities in Northamptonshire

CAN

Nene Valley Homechoice (now known as Homes Direct)

Family Support Link

Homeless Link

Rushden Sanctuary (night shelter)

Citizen's Advice Bureaux

Northamptonshire County Council – Social Services

Northamptonshire County Council – commissioning

Nene Valley Community Action

Together

Youth Offending Team

Bromford Support

Northamptonshire Probation

Northamptonshire Police

Women's Aid



## Appendix 4 – Consultation Questions and Response Pro-forma

### **Background and Scope**

Do you consider this section provides adequate and understandable background and scope to the strategy?

### **Housing Market**

Have we provided enough information on our housing market?

If not, in what areas would further data and analysis be useful?

### **Guidance for Registered Providers**

Have we provided sufficient guidance under this section?

If not, what additional guidance is required?

What are your views on our position on fixed term tenancies?

If you are a registered provider, are you planning to use fixed term tenancies?

If so, under what circumstances do you anticipate not re-issuing the tenancy at the end of the fixed term period?

Are there any circumstances where you will still be offering lifetime tenancies?

Other organisations, do you have any views on the use of fixed term tenancies?

Are there any specific groups that you feel we have not covered enough in the strategy?
Do you have any views on our position on Affordable Rent?
If you are a registered provider, are you intending to convert any of your existing stock to Affordable Rent? And if so, what levels?
If you are a Registered Provider, do you have any specific policies or procedures relating to mobility?
What are your views on the use of local lettings policies?
What are your views on the use of private rented accommodation to discharge homelessness duty?
<b>Consultation and Communication</b>
Do you feel that we have consulted widely enough, and for long enough?
<b>Review and Monitoring</b>
Do you support this approach to monitoring and reviewing the strategy?
<b>Equality and Diversity</b>
Do you feel that there is anything else we can do to ensure that this strategy addresses the tenancy needs of everyone?
<b>General</b>
Do you have any other comments you wish to make?





### EIA Initial Screening Form – policy

<b>1. Name of Policy:</b>	<b>Draft Tenancy Strategy for Consultation</b>
<b>2. Name and Job title / role of person completing Initial Screening:</b>	Cat Hartley, Housing Strategy Manager
<b>3. What is the main purpose of the Policy?</b>	To provide guidance to Registered Providers on the type and length of tenancies they should offer, and in what circumstances.
<b>4. Who is the Policy aimed at?</b>	Registered Providers
<b>5. How is the success of the Policy measured?</b>	<p>The strategy is intended to give broad and general guidance to Registered Providers, and therefore does not have any specific targets or measurable outcomes against which success can be monitored.</p> <p>If the strategy is unsuccessful then one of the indicators of this could be increased homelessness via failure of tenancies and this will be carefully monitored.</p>
<b>6. Are equality monitoring systems for the Policy in place?</b>	The allocation of affordable housing properties to equality groups is monitored via our housing options service.

**7. Use the following table to indicate using a ✓:**

- a) Where you think that the Policy could have a positive impact on any of the groups or contribute to promoting equality of opportunity or improving relations within equality groups.
- b) Where you think that the Policy could have a negative impact on any of the equality groups i.e. it could disadvantage them.
- c) Where you think that the Policy could have a neutral impact on any of the equality group i.e. no impact

Equality Group	Positive Impact	Negative Impact	Neutral Impact	Reason
<b>Gender:</b>				
Women/Girls			✓	The strategy does not direct providers to differentiate on the issue of gender when considering tenancy types. Neither is it considered that there will be any indirect impact.
Men/Boys			✓	See above.
Transgender people			✓	See above.
<b>Sexual Orientation:</b>				
Lesbians, gay men and bisexuals			✓	The strategy does not direct providers to differentiate on the issue of sexual orientation when considering tenancy types. Neither is it considered that there will be any indirect impact.
<b>Race/Ethnicity:</b>				

Equality Group	Positive Impact	Negative Impact	Neutral Impact	Reason
White British people			✓	The strategy does not direct providers to differentiate on the issue of race/ethnicity when considering tenancy types. Neither is it considered that there will be any indirect impact.
White non-British people (including Irish people)			✓	See above.
Asian or Asian British people			✓	See above.
Black or Black British people			✓	See above.
People of mixed heritage			✓	See above.
Chinese people			✓	See above.
Travellers (Gypsy/Roma/Irish heritage)			✓	See above.
People from other ethnic groups			✓	See above.
People who do not have English as their first language			✓	See above.
<b>Disability:</b>				
Physical impairment, e.g mobility issues which mean using a wheelchair or crutches.	✓			The strategy directs providers to offer specific minimum tenancy periods to those with a disability or special needs; in recognition of the fact that they have more specific accommodation requirements.

Equality Group	Positive Impact	Negative Impact	Neutral Impact	Reason
Sensory impairment, e.g. blind/having a serious visual impairment, deaf/having a serious hearing impairment.	✓			See above.
Mental health condition, e.g. depression or schizophrenia	✓			See above.
Learning disability/difficulty, e.g. Down's syndrome or dyslexia, or cognitive impairment such as autistic spectrum disorder	✓			See above.
Long-standing illness or health condition, e.g. cancer, HIV. Diabetes, chronic heart disease or epilepsy	✓			See above.
Other health problems or impairments ( <i>please specify if appropriate</i> )	✓			See above.
<b>Age:</b>				
Older People (60+)	✓			The strategy directs providers to offer specific minimum tenancy periods to older people, in recognition of the fact they will potentially have greater support needs, or be residing in sheltered accommodation.
Children and Young People (see guidance for definition)	✓			The strategy directs providers to give careful consideration to the appropriate tenancy periods for families with school age children or those under the age of 35.

Equality Group	Positive Impact	Negative Impact	Neutral Impact	Reason
<b>Religion/Belief:</b>				
Christian			✓	The strategy does not direct providers to differentiate on the issue of religion/belief when considering tenancy types. Neither is it considered that there will be any indirect impact.
Buddhist			✓	The strategy does not direct providers to differentiate on the issue of religion/belief when considering tenancy types. Neither is it considered that there will be any indirect impact.
Hindu			✓	The strategy does not direct providers to differentiate on the issue of religion/belief when considering tenancy types. Neither is it considered that there will be any indirect impact.
Jewish			✓	The strategy does not direct providers to differentiate on the issue of religion/belief when considering tenancy types. Neither is it considered that there will be any indirect impact.



Equality Group	Positive Impact	Negative Impact	Neutral Impact	Reason
Muslim			✓	The strategy does not direct providers to differentiate on the issue of religion/belief when considering tenancy types. Neither is it considered that there will be any indirect impact.
Sikh			✓	The strategy does not direct providers to differentiate on the issue of religion/belief when considering tenancy types. Neither is it considered that there will be any indirect impact.
Other religion (including holding no belief)			✓	The strategy does not direct providers to differentiate on the issue of religion/belief when considering tenancy types. Neither is it considered that there will be any indirect impact.
<b>Other Potentially Affected Groups</b>				
Rural Isolation - People who live in rural areas e.g isolated geographically, lack of internet access	✓			The strategy directs providers to give careful consideration to the appropriate tenancy periods for households living in rural areas..

Equality Group	Positive Impact	Negative Impact	Neutral Impact	Reason
Socio-economic Exclusion – e.g. people who are on benefits, have low educational attainment, single parents, people living in poor quality housing, people who have poor access to services, the unemployed or any combination of these and the other protected strands	✓			The strategy relates to tenancy types for affordable housing; which directly benefits those who may fall within this equality group.
Any other potentially affected groups ( <i>please specify</i> )				
<b>8. If you have indicated that there is a negative impact on any group:</b>				
a) Is that impact against legislation?	Yes		No	
b) What is the level of impact?	High		Low	
9. Could you minimise or remove any negative impact that is of low significance?	How?			
10. Could you improve a positive impact of the Policy?	How?			
11. If there is no evidence that the Policy promotes equality of opportunity or improved relations, could it be adapted so that it does?	How?			
Head of Service signature				
<b>Date of Initial Screening:</b>	6 June 2012			