

Joint Tenancy Strategy

2012 – 2015

Introduction

The Localism Act 2011 sets out the requirement for local housing authorities to publish a Tenancy Strategy by 15 January 2013 and indicates that the following should be included:

- what kind of tenancy to offer;
- the circumstances in which they will grant a tenancy of a particular kind;
- where a tenancy is for a set term, the length of term that will be offered; and
- the circumstances in which they will grant a further tenancy, when the existing tenancy ends

In producing a strategy, account must be taken of:

- current allocation policies; and
- current homelessness strategies

The housing authorities in Dorset have a well established track record of joint working. As a result, the following 7 Councils have collaborated to produce a single framework Tenancy Strategy:

- Borough of Poole
- Christchurch Borough Council
- East Dorset District Council
- North Dorset District Council
- Purbeck District Council
- West Dorset District Council; and
- Weymouth and Portland Borough Council

We are of the view that a single strategy, shared by a number of authorities will provide a more viable framework for Registered Providers, many of whom work across a number of Dorset authorities. However, while many of the shared principles expressed here enable a pan-Dorset Tenancy Strategy to be developed, it is also important to recognise specific local differences. These will be fully reflected within the local Housing Strategies of each of the partner authorities, which are the primary housing documents for each area.

With the exception of the Borough of Poole whose stock is managed by Poole Housing Partnership, an Arm's Length Management Organisation set up to manage and improve the stock, none of the authorities have their own stock. For stock transfer authorities, influence over the letting of the affordable housing stock in their area is vital.

While Registered Providers need only "have regard to" tenancy strategies in developing their tenancy policies, we expect those working as key partners in Dorset to reflect the views expressed in this document.

We recognise that some Registered Providers have already entered into legally binding contracts with the Homes and Communities Agency as a condition of funding agreements. These are likely to have included indications on the length of tenancy offered and

conversion of social rent tenancies to affordable rent - decisions made well in advance of the Localism Act. We expect that future cyclical reviews of these policies will take into consideration the issues and concerns raised in this document and the guidelines provided.

Context

There are three main drivers that lie behind the development and approach set out in this Strategy.

a. Government Policy

The government has indicated that it regards social housing as a step towards other types of housing rather than a destination and has identified a number of perceived problems that it seeks to address, including:

- social housing as a scarce resource which needs to be used more effectively
- life-time tenancies take no account of how a household's circumstances may change
- high levels of unemployment within the social rented sector with little incentive for tenants to gain employment
- poor public perception of social housing
- lack of public funding to increase the supply of new social housing

Its programme of social housing reform has four main aims:

- to make the system fairer, striking a balance between the needs of new and existing tenants
- to enable decisions about who lives where and for how long to be taken on the basis of local need and circumstances
- to create a housing system which is better focussed on need; providing protection and support for those who need it most, for the period they are in need; and
- to shift the public perception of social housing to being a springboard into work and self sufficiency

In seeking to address these aims the government has:

- introduced fixed term tenancies for social housing
- placed a duty on local authorities to publish a tenancy strategy
- given local authorities greater control of their waiting list
- enabled authorities to discharge their homelessness duty through accommodating a household with a year-long tenancy in the private rented sector; and
- encouraged social landlords to improve existing tenants' opportunities to move home

b. Local Housing Strategies

Each of the local authorities party to this Tenancy Strategy have their own Housing Strategy which evaluates housing needs in their areas and promotes a range of responses to address these needs. This strategy needs to be viewed in conjunction with these key local documents.

c. Registered Provider Regulation

The regulatory framework for Social Housing in England from April 2012” requires that:

“registered providers let their homes in a fair, transparent and efficient way, taking into account the housing needs and aspirations of tenants and potential tenants. They also need to demonstrate how their lettings:

- make the best use of available housing
- are compatible with the purpose of the housing
- contribute to local authorities’ strategic housing function and sustainable communities

There should be clear application, decision-making and appeals processes.”

In addition, Registered Providers must publish clear and accessible policies which outline their approach to tenancy management, including interventions to sustain tenancies and prevent unnecessary evictions, and tackling tenancy fraud.

d. Welfare Reform

We also recognise that the wider programme of welfare reform will potentially have a major impact on affordability, particularly for low income households. While a number of changes have already come into force, many will not come into effect until April 2013. Furthermore, October 2013 will see the gradual phasing in of Universal Credit through which housing benefit and a number of other means tested benefits will be made into a single payment paid directly to tenants.

Any views expressed in this strategy relating to affordable rent levels will therefore need to be reviewed in the light of the full impact of these changes. We will expect this to form a structured part of any annual review process.

The aims of our Tenancy Strategy

Our aims through the development of this strategy is that in conjunction with the wider measures contained in local Housing Strategies, we will:

- ensure that affordable housing meets locally identifiable housing need
- provide guidance and direction to Registered Providers regarding their use of Affordable Rent properties, fixed term and disposals

- indicate to existing and prospective tenants what they can expect from an Affordable Rent tenancy.
- sustain provision of new affordable housing at a time of limited public investment
- help Registered Providers increase revenue income for future investment and delivery of affordable housing

Developing our Tenancy Strategy

This strategy has been developed in consultation with the seven authorities and senior representatives of Poole Housing Partnership together with Registered Providers with the largest stock holdings in the area.

However, we recognise the need to further review some key aspects of our operations to reflect the content of the Localism Act. These include:

Dorset Home Choice - the allocations policy shared by Poole, North Dorset District Council, Purbeck District Council, West Dorset District Council; and Weymouth and Portland Borough Council. This was implemented in April 2012 and will be reviewed during 2013 to take into account the changes associated with the Localism Act and the results of recent government guidance.

Christchurch and East Dorset Council will also be reviewing their allocations policies during 2013 following the implementation and review of a shared service.

The Homelessness Strategy shared by all the authorities except Poole will be reviewed in 2013. Poole is in the process of developing a new housing strategy which will include a homelessness chapter. This will also be reviewed in 2013.

The Localism Act gives local authorities a new power to end the duty to homeless households to whom they owe a statutory duty through an offer of accommodation in the private sector. Applicant consent will no longer be required. Our full response to the power will form part of the homelessness strategy reviews, however in the interim we propose to exercise the power when appropriate.

The final version of this strategy will be placed on Dorset For You, Dorset Home Choice and the Borough of Poole's website. Hard copies will be available on request.

Reviewing our Tenancy Strategy

Although covering the period 2012 -2015 the strategy will be reviewed annually with Registered Provider input.

The Dorset Housing Services Group will work closely to continue to monitor the implementation of the Tenancy Strategy and ensure we address any unintended consequences promptly and effectively.

This strategy provides an overview of how we will address the issues of rent and tenure reform, the homelessness duty and the use of the private rented sector and changes to the housing register.

The strategy does not advise on rent setting. With the exception of issues relating to the termination of fixed term tenancies it does not consider tenancy management.

Local Context – Homes in Dorset

Dorset is an attractive but expensive place to live, with the result that open market residential accommodation is unaffordable for many households.

Local authority	Ratio of house prices to incomes
Borough of Poole	14.6
Christchurch BC	13.7
East Dorset DC	15.0
North Dorset DC	13.9
Purbeck DC	13.9
West Dorset DC	12.5
Weymouth and Portland BC	11.2

The 2011 Strategic Housing Market Analysis for Weymouth & Portland and West Dorset (WP/WD) indicated that around 25% of households cannot afford housing at current market prices/rents without the need for some form of subsidy. This number rises to 26% in the Poole and Bournemouth HMA. In both HMAs, the opportunity for accessing affordable homes is extremely limited, with only 10% of homes in Bournemouth and Poole being affordable and 14% in WP/WD.

The net annual need for additional units of affordable housing per annum if all needs are to be met for each of the Dorset authorities over the next five years is indicated below:

Local authority	Total Net Annual Need
Borough of Poole	1710
Christchurch BC	332
East Dorset DC	426
North Dorset DC	387
Purbeck DC	520
West Dorset DC	753
Weymouth and Portland BC	904
TOTAL	5032

Our current experience is that these levels of need are unlikely to be satisfied. For all the authorities involved in this strategy the provision of affordable housing is a top priority, but in recent years the total number of affordable homes built has fallen well below the number needed.

The development of new homes has dropped significantly and the erosion of social housing grant is likely to perpetuate this. In 2009/10 HCA funding provided 455 new

homes in the local authorities covered by this strategy. In 2011/12 the figure was 268 (see below).

Local authority	2011/12
Borough of Poole	1
Christchurch BC	0
East Dorset DC	4
North Dorset DC	128
Purbeck DC	10
West Dorset DC	74
Weymouth and Portland BC	51
TOTAL	268

The impact of this affordability gap is reflected in the number of households on our Housing Registers as at October 2012:

Local authority	Housing register numbers
Borough of Poole	3520
Christchurch BC	2331*
East Dorset DC	3108*
North Dorset DC	1009
Purbeck DC	1542
West Dorset DC	2390
Weymouth and Portland BC	2771

*In 2012 all the authorities with the exception of Christchurch and East Dorset reviewed their housing registers.

The main housing issues and challenges within the area are:

- the need for more affordable housing
- the high cost of owner occupation and private sector renting; and
- low wages in comparison to the national average

Affordable Rent

The 2010 Comprehensive Spending Review introduced Affordable Rent as an alternative to social rent. Before this all rented properties in the affordable housing sector were let at social rents, generally in the region of 50-60% of market rents.

Affordable rents are set at 80% of the market rent locally (inclusive of service charges) for a comparable property.

The tables below highlight the difference between average social rent, market rent and 80% of market rents. In view of the difference in private rental values between the west and east of the county, the tables are divided into east and west.

East Dorset Average rents

(Bournemouth, Christchurch, East Dorset and Poole)

Property type	Market rent (data taken from 2011 SHMA reports for each LA area)	80% of Market rent (affordable rent)	RP Social rent – average across stock in area (includes service charge)	Difference (+/-) between average RP social rent and 80% of Market rent
1 bed	£120.23	£96.18	£70.93	£25.25
2 bed	£161.77	£129.42	£83.31	£46.11
3 bed	£206.08	£164.86	£94.49	£70.37
4 bed	£271.15	£216.92	£103.22	£113.70

West Dorset Average Rents

(Purbeck, North Dorset, West Dorset, Weymouth and Portland)

Property type	Market rent (data taken from 2011 SHMA reports for each LA area)	80% of Market rent (affordable rent)	RP Social rent – average across stock in area (includes service charge)	Difference (+/-) between average RP social rent and 80% of Market rent
1 bed	£109.62	£87.70	£70.93	£16.77
2 bed	£138.69	£110.95	£83.31	£27.64
3 bed	£188.77	£151.02	£94.49	£56.53
4 bed	£207.69	£166.15	£103.22	£62.93

These figures are averages and in some areas, the difference is likely to be more significant.

For all property types the difference between social rent and affordable rents are considerable and unless supported by housing benefit will be unaffordable for many low income tenants.

Currently, tenants moving into Affordable Rent properties will be eligible for housing benefit. However as referred to earlier, from April 2013 benefits will be capped.

Within the area four Broad Market Rental areas operate – Bournemouth, Dorchester, Yeovil and Salisbury. The weekly Local Housing Allowance levels for these for the period 1st April 2012 to 31st March 2013 are below:

	Bournemouth LHA rates	Dorchester LHA rates	Yeovil LHA rates	Salisbury LHA rates
1 bed	£121.15	£104.00	£91.15	£115.38
2 bed	£150.00	£137.31	£121.15	£144.23
3 bed	£184.62	£160.38	£144.23	£173.08
4 bed	£253.85	£199.62	£190.38	£230.77

These rates are the maximum which can be received and suggest that care will need to be taken to ensure 2 and 3 bedroom Affordable Rent properties within the Yeovil Broad Market Rental Area do not exceed the Local Housing Allowance.

Evidence exists that larger households on low incomes are increasingly dependent on affordable housing due to the additional costs of maintaining their family.

For existing social rent tenants the Affordable Rent model may act as a disincentive to move to a different home.

We are concerned that a wholesale movement to affordable rents rather than target rents, coupled with the impact of welfare reform will make access to appropriate housing even harder for many households on low incomes.

Affordable Rent - What we expect of Registered Providers in Dorset

We accept that the Affordable Rent model provides a means of securing new housing and that Registered Providers have already signed contracts with the HCA for the development of new affordable homes. However, there are a number of points we expect providers to consider when developing or updating their policies:

- each local authority expects to benefit from the development opportunities generated in their area from affordable rents and if not for the benefits to remain with the authorities involved in this strategy if development opportunities exist.
- on open market sites developed without HCA funding we continue to expect the tenure split to be in accordance with each Council's affordable planning policy in order to address the continuing need for social rent. If the provision of social rented housing is unviable, we will work with developers and Registered Providers on a site by site basis.
- where a new build scheme is being delivered that will include affordable rented units we expect the proposed affordable units and the rent levels to be agreed with the relevant authority
- any social rented properties delivered through a section 106 agreement will require local authority permission to be converted to affordable rent. Under these circumstances the section 106 agreements will be reviewed on a case by case basis to establish if any conversion proposals remain compliant with the section 106 agreement, or if the tenure change is acceptable to the local authority whether a variation is necessary.
- Where a local authority has provided either land or capital to assist the provision of social rent properties, these will not be converted to affordable rent.

- before potential tenants sign their tenancy agreement, Registered Providers should carry out financial assessments of affordability, particularly where rents are at or close to Local Housing Allowance levels.
- any financial issues which arise during the tenancy must be addressed at an early stage
- as with social rented properties all affordable rent homes must be allocated through the appropriate allocations policy to ensure fairness and transparency
- Registered Providers are expected to explore with the HCA any Affordable Rent model exemptions as necessary, for example to enable provision of affordable housing in rural parishes where housing costs are high
- to avoid excessively high affordable rents in high value areas the rents charged for affordable rented properties should not exceed the relevant Local Housing Allowance (LHA) rate applicable for that property size at the time of rent setting.
- the need to continue to ensure a reasonable supply of family –size accommodation available at social rents
- the need to ensure that properties in rural areas can be let to those working in the area on low wages.
- the need to ensure that under-occupiers wishing to downsize are not put off by having to pay a higher rent

We also have particular concerns about access and affordability within:

- high value rural areas which have a limited supply of social housing and other affordable housing; and
- the future provision of supported housing for vulnerable households under the Affordable Rent model, where service charges can be high.

For the main stock holding organisations in the area, details of affordable rent conversions and fixed term tenancies during the current affordable housing programme 2011-2015 are provided in Appendix 1.

Fixed term tenancies

The Localism Act allows Registered Providers to let affordable housing on assured shorthold tenancies for a fixed term. Fixed term tenancies are provided for specific periods and can be used for properties let at both social rent and affordable rent.

This is a move away from the current situation, whereby a tenancy with a social housing provider either Council or Housing Association was perceived as a tenancy for life, provided the tenancy conditions were complied with.

The introduction of fixed term tenancies is intended to give greater freedom to housing providers to:

- manage assets for the greatest financial return
- respond to local circumstances and the changing needs of individual households
- promote clarity and fairness; and
- ensure support focusses on those who need it for as long as they need it

Existing lifetime tenants whose tenancies started before the Localism Act came into force will retain their existing security of tenure if they choose to move to another social rented home, unless it is let at an Affordable Rent.

Fixed term tenancies – What we expect of Registered Providers in Dorset

We recognise that Registered Providers may want to take advantage of the new provisions which enable them to provide fixed term tenancies.

We also acknowledge that the decision to use fixed term tenancies and the length of these tenancies lies with the Registered Provider.

Where Registered Providers issue fixed term tenancies we expect the adoption of the following basic principles as a minimum:

- the fixed term tenancies used should be set at a minimum of five years following a probationary tenancy period, typically six months, in all but exceptional cases
- where a period of less than five years is proposed, we expect providers to discuss this with us at the earliest opportunity
- any “probationary tenancy” period (including any extensions) will be regarded as being in addition to the minimum length of tenancy.
- longer fixed term tenancies may be more appropriate for families with dependent school age children attending a local school
- fixed term tenancies should only be used for general needs stock, not sheltered, extra care or supported accommodation
- fixed term tenancies should not be used as an alternative to the usual remedies available to address a tenancy breach

- to help create sustainable communities and prevent areas becoming management problems it may be necessary to use longer fixed term tenancies. This approach may have implications for other providers in the area and we expect providers to discuss their proposals with us at the earliest opportunity
- clear and concise advice and information must be provided to tenants at all stages, with information on the review process - including how a tenant can register a complaint or appeal against tenancy decisions - provided in advance of sign up
- In addition to providing advice on the review process, Registered Providers should also signpost their tenants to independent sources of advice such as the Citizens Advice Bureau and Shelter.

Tenant mobility

We want to ensure these changes do not restrict the mobility of existing tenants living in the social rented sector, particularly households under or over occupying their property.

To encourage mobility and stock turnover, all existing social tenants will retain their existing security of tenure if they choose to move to another property through a mutual exchange. However, this protection will only apply to tenants who had an assured tenancy on 1 April 2012 and only applies to the type of tenancy – not the rent level.

Where tenants are required to move to a property on Affordable Rent terms, for example as a result of demolition, landlords will be required to provide a tenancy with no less security.

However, under the revised tenancy standard existing tenants who successfully bid for a property let on Affordable Rent terms can be offered a fixed term tenancy.

Strategies to reduce under occupation will be looked at separately.

Succession

For tenancies entered into after 1 April 2012 the Localism Act has limited succession to spouses or civil partners of the deceased tenant. However, landlords are able to grant additional succession rights under the tenancy agreement.

Succession – What we expect of Registered Providers in Dorset

We expect Registered Providers to make their policy on succession for all tenancy types and the granting of any additional rights clear and take account of the needs of vulnerable household members.

Tenancy Types

Within the Localism Act, four options are available to Registered Providers when granting a tenancy:

- full assured social rent
- full assured affordable
- fixed term social rent; and
- fixed term affordable rent

For some groups the type of tenancy issued will have more impact.

Tenancy Types – What we expect of Registered Providers in Dorset

- We expect Registered Providers to have a published tenancy policy and for a copy to be available on request.
- We expect Registered Providers to consider the specific needs of vulnerable tenants when deciding on the type of tenancy to provide.
- In most circumstances we would wish to see tenants moving into sheltered and extra care accommodation given the most secure type of tenancy available.
- We would expect tenants moving into general needs accommodation to be given more flexible types of tenancy unless there are exceptional circumstances.
- There may be some circumstance where it is considered that, due to their individual circumstances, a tenant going into general needs property should be granted a more secure form of tenancy. These circumstances may include learning disability, chronic physical disability, and those with a severe and enduring mental health problem which would disadvantage them in securing alternative accommodation.

Ending tenancies at the end of the fixed term – Guidance for Registered Providers

We welcome the opportunity for Registered Providers to be able to review fixed term tenancies to make best use of housing stock and make it available to those who need it most. However, we anticipate that most fixed term tenancies will be renewed and that many tenants will need to stay in social housing either in their current home or another more suitable property.

Ending Tenancies – What we expect of Registered Providers in Dorset

When reviewing fixed term tenancies we expect Registered Providers to work in partnership with the relevant local authority and take the following into consideration:

- the current circumstances of the household and the need for a property of the type and size occupied
- the financial capacity (both earned income and benefit entitlement) of the tenant to secure alternative market accommodation or an affordable tenure on a different property. However, the assessment must not act as a disincentive to work

- the conduct of the tenant throughout the fixed term tenancy
- We are committed to ensuring that any decisions to terminate a fixed term tenancy do not lead to an increase in homelessness approaches.
- Where a joint decision is taken in conjunction with the local authority not to renew a fixed term tenancy we expect the Registered Provider to engage with the tenant at the earliest opportunity and ensure the tenant is clear about the Registered Provider's intentions.
- Registered Providers should provide households affected by the termination of a tenancy with relevant advice and assistance that will enable them to successfully relocate to alternative suitable accommodation.

Stock Disposal - What we expect of Registered Providers in Dorset

- We expect Registered Providers to consult with the relevant authority about the disposal of any properties.
- We will support the disposal of housing stock where Registered Providers can demonstrate they have:
 - a formally agreed strategy in relation to asset disposals
 - the proceeds can more productively be used to develop new affordable housing within the local authority area than maintaining the existing property; and
 - there will be no negative impacts on the balance and sustainability of the local neighbourhood.
- We will support and encourage measures which make the most effective use of existing housing stock by:
 - encouraging under-occupying tenants to move to properties of a size more suited to their needs; or
 - seek to address non-contractual sub-letting
- We will not support the disposal of the following types of housing without the support of a very strong business case which allows for future investment in more appropriate housing in the local authority:
 - larger homes for example three bedroom homes with potential for use as four bedroom houses, or homes able to accommodate six people or more
 - properties suitable for downsizing initiatives
 - homes in smaller rural settlements
 - supported or specialist housing
 - homes which have been extensively adapted

Homelessness prevention- What we expect of Registered Providers in Dorset

- Registered Providers must have clear and well communicated procedures for possession and eviction.
- They must show that they have fully engaged with the tenant to try and prevent possession action, including the use of outside agencies for support.
- We expect Registered Providers to develop and have in place eviction protocols which include:
 - policies designed to prevent homelessness
 - provide appropriate support for vulnerable people; and
 - work in partnership with Councils to prevent homelessness or provide practical housing options

Equalities

A key aim of this strategy is to ensure equal access to our housing register, subject to need-specific determinants of priority and eligibility. We wish to ensure that no household is disadvantaged either in registering or bidding for property because of personal characteristics or abilities.

An Equalities Impact Assessment of this strategy is attached as Appendix 2.

Wherever possible, we will implement any actions or steps identified by the EqIA as soon as it is practical to do so.

We expect all Registered Providers to carry out EqIAs of their tenancy policies.

Responding to the consultation

The group which developed this strategy will provide feedback on whether comments received via the consultation have been incorporated into the strategy and will provide reasons where it has not been feasible to take action. This will be placed on Dorset For You, Dorset HomeChoice and the Borough of Poole's website.

Glossary

Affordable housing: Housing options available to residents who cannot afford to rent or buy a home in the open market. Affordable housing includes social rented housing, affordable rent housing and intermediate housing solutions such as shared ownership.

Affordable Rent: Rents offered by Registered Providers of social housing at up to 80% of the rent that would be charged if the property were let in the open market.

Conversion: a former social rented property re-let at an affordable rent

Comprehensive Spending Review: Government review of national public sector spending to plan expenditure over the medium term. Reviews take place every three years.

Equality impact assessment: An equality impact assessment assesses the likely or actual effects of strategies, policies or services on people in respect of disability, gender and racial equality. It helps ensure the needs of people are taken into account when we develop and implement a new strategy, policy or service or make a change to a current strategy, policy or service

Extra care housing: housing designed for frailer older people with varying levels of care and support available on site. People who live in Extra Care Housing have their own self contained homes. Extra Care Housing is also known as very sheltered housing, assisted living, or 'housing with care'.

Fixed term tenancy: A tenancy offered for a specified period of time.

General needs accommodation: accommodation which will meet the needs of households without any specific support needs.

Homes and Communities Agency (HCA): The national housing and regeneration agency for England, responsible for allocating funding for new affordable housing. A non-departmental public body, sponsored by the Department of Communities and Local Government. In April 2012 the HCA took over the regulation of Registered Providers from the Tenant Service Authority.

Homelessness duty: A local authority owes the “main homelessness duty” when the authority is satisfied a homeless household is eligible for assistance, unintentionally homeless and falls within a specified priority need group. When this duty is owed, the authority must ensure suitable accommodation is available for the household.

Housing Register: A list of households who wish to be rehoused by a social landlord including tenants of social landlords who wish to transfer. Often referred to as a waiting list.

Local Housing Allowance: The current form of housing benefit paid to people with low incomes renting in the private sector.

Localism Act: Received royal assent on 15th November 2011

Market rent: The rental income that at property would most probably command on the open market.

Probationary period: A probationary tenancy (also known as a starter tenancy) is an assured short hold tenancy. It is intended to last for an initial 12 month period.

Registered providers: Organisations that provide affordable housing to those in housing need. Often these providers are housing associations. They are registered with the HCA.

Section 106 agreement: Section 106 of the Town and Country Planning Act 1990 allows a local planning authority to enter into a legally-binding agreement or planning obligation with a landowner in association with the granting of planning permission. The obligation is termed a Section 106 Agreement.

Sheltered housing: housing designed to provide additional support to enable independent living, usually for people over 60. The accommodation is self contained.

Social housing: Housing that is let at low rents and on a secure basis to people in housing need. It is generally provided by councils and not-for-profit organisations such as housing associations.

Social rent: Housing for which guideline target rents are determined through the National Rent Regime. Rents are usually significantly lower than market levels.

Strategic Housing Market Assessment: An assessment of how housing markets operate in defined areas, used to identify housing needs within that area.

Tenancy fraud: There are many types of tenancy misuse, for example not using the property as the 'sole or principal home', obtaining a property through false statements and obtaining a property by using false documents.

Tenancy policy: Tenancy policies are a new requirement for Registered Providers and stock holding local authorities introduced by the Homes and Communities Agency.

The policies must outline the providers approach to tenancy management, including interventions to sustain tenancies, prevent unnecessary evictions and tackle tenancy fraud.

Universal credit: Universal credit will bring together a number of working age benefits into a single payment. It will be implemented gradually from October 2013 to October 2017.

Appendix 1

Estimated affordable rent conversion/fixed term conversions during the current affordable housing programme 2011-2015

Registered Provider	Stock holding in the area	Estimated % of conversions
Magna Housing Association	5684	0
Radian Housing Group	327	2%
Raglan Housing Association Limited	1395	8%
Sovereign Housing Group	2530	25%
Spectrum Housing Group	1724	11%
Synergy Housing Group	7953	16%

Source: Data provided by each Registered Provider

Appendix 2

Full Equality Impact Assessment Record

Section 1:

Service:

Housing

Title of strategy, policy or service:

Joint Tenancy Strategy

Officers involved in the EQIA:

Kerry Ruff

Type of strategy, policy or service (delete below as appropriate):

New



Q1 – What is the aim of your strategy, policy, project or service?

The publication of a Tenancy Strategy by local housing authorities is a requirement of section 150 of the Localism Act

. The purpose of the strategy is to provide clear and agreed principles that should inform the tenancy policies of all Registered Providers with housing stock in the area. It aims to:

- ensure that affordable housing meets locally identifiable housing need
- provide guidance and direction to Registered Providers regarding their use of Affordable Rent properties, fixed term and disposals
- indicate to existing and prospective tenants what they can expect from an Affordable Rent tenancy.
- sustain provision of new affordable housing at a time of limited public investment
- help Registered Providers increase revenue income for future investment and delivery of affordable housing

Q2 – Who is it going to benefit and how? If this is a changing function state who will be affected or not longer benefit

The changes introduced through the Localism Act will affect:

- housing register applicants who are allocated a property with a registered housing provider;
- current residents of registered providers who wish to transfer; and. existing tenants with registered housing providers who are considering mutually exchanging their property.

Q3 – What outcomes do you want to achieve?

Local Registered providers accepting the guidance set out within the tenancy strategy and taking it into account within their own tenancy policies.

Q4 – Are there barriers to doing this?

Registered providers are only required to “have regard to” tenancy strategies and therefore not all of the principles may be implemented meaning that existing social housing stock is not used to its full potential

Q5 – How will you put this into practice?

The strategy has been developed in partnership with the main stock holding registered providers in the area. The strategy will be monitored by the Dorset Housing Services Group which is attended by strategic housing representatives of all the Dorset housing authorities and senior representatives from registered providers with the largest stock holdings in Dorset.

Through continued partnership working the aims of the strategy should be achievable. The group will review the tenancy strategy on an annual basis with registered provider input.

Joint working may be required at other times to ensure we address any unintended consequences promptly and effectively.

Section 2: Information gathering and judging impact

Q6 - What existing information and data do you have?

Housing Register Data

Q7- What does this tell us about the likely impact on different groups?

General / all equality groups

Affordable Rent fixed term tenancies may lead to an increase in the numbers of households put a risk of becoming homeless.

The affordable rent product (80% of market rent) may have an impact on households with a lower income not in receipt of benefit assistance and - when Universal Credit comes into effect - those reliant on benefit.

Age

The strategy aims to ensure social housing is used as efficiently as possible to meet the needs of social housing applicants at different stages of their lives.

Disability

The strategy aims to ensure vulnerable clients are granted tenancies of a length appropriate to their needs.

Where adaptations are made to properties this will be taken into consideration through the tenancy review to ensure that vulnerable clients are not disadvantaged.

Gender reassignment

We have no specific information collected through the housing register to suggest there would be any impact on this group

Pregnancy and maternity

The affordable rent product (80% of market rent) may have an impact on households with children that have a lower income that are reliant on benefit assistance and also those that are not reliant on benefit assistance..

Race

We have no specific information collected through the housing register to suggest there would be any impact on this group

Sex

The Tenancy Strategy supports the need to treat all groups equally by reminding landlords of their responsibilities to make decisions based on evidence and in accordance with their own policies.

The affordable rent product (80% of market rent) may have an impact on single parent households that have a lower income that are reliant on benefit assistance and also those that are not reliant on benefit assistance. Our housing register data shows that there is a greater number of single mothers.

Religion or Belief

We have no specific information collected through the housing register to suggest there would be any impact on this group.

Sexual orientation

We have no information collected through the housing register to suggest there would be any impact on this group

Socially excluded groups

Low Literacy and Vulnerable households – The introduction of complicated housing options in terms of tenure and rent level may be confusing for some vulnerable households, including those with low literacy levels.

Q8 - Is there any potential for direct or indirect discrimination? Yes

If yes, please use the action plan below to say how this will be mitigated

Section 3: Action planning

Issue	Objective/ Intended outcome	SMART action	Performance Target	Lead	Deadline
General equality issues	To avoid homelessness	The strategy sets out expectations placed on registered providers for homelessness prevention work.	The strategy will be reviewed annually by the Dorset Housing Services Group	Dorset Housing Services Group	Annual review
	To avoid affordability issues	The strategy sets out guidance for registered providers to carry out financial assessments on prospective tenants, it also states that the rents should not exceed the relevant local housing allowance	The strategy will be reviewed annually by the Dorset Housing Services Group	Dorset Housing Services Group	Annual review
Age	No action required				
Disability	No action required				
Gender reassignment	No action required				
Pregnancy and Maternity	To avoid affordability issues	The strategy sets out guidance for registered providers to carry out financial assessments on prospective tenants, it also states that the rents should not exceed the relevant local housing allowance	The strategy will be reviewed annually by the Dorset Housing Services Group	Dorset Housing Services Group	Annual review
Race	No action required				

Religion or belief	No action required				
Sex	To avoid affordability issues	The strategy sets out guidance for registered providers to carry out financial assessments on prospective tenants, it also states that the rents should not exceed the relevant local housing allowance	The strategy will be reviewed annually by the Dorset Housing Services Group	Dorset Housing Services Group	Annual review
Sexual orientation	No action required				
Socially excluded groups	To ensure low literacy & vulnerable clients are given support to ensure they understand their options	The strategy sets out a requirement for all registered providers to provide access to clear and concise advice and information at all stages.	The strategy will be reviewed annually by the Dorset Housing Services Group	Dorset Housing Services Group	Annual review
		Local Authorities will need to check and ensure that affordable rent properties and fixed term tenancy adverts should be clear about what the product is when it is advertised	Dorset Home Choice Partnership and East Dorset District Council will ensure the quality of property adverts	Dorset Home Choice Partnership and East Dorset District Council	Annual review
		Local Authorities that do not advertise available properties will need to ensure that their allocation service makes sure	Christchurch Borough Council will ensure their allocations staff are fully briefed on affordable rent properties and that	East Dorset District Council & Christchurch Borough	Annual review

		<p>applicants are clear about the property conditions they are being offered.</p> <p>To ensure Local Authority housing can provide additional advice and support if required</p>	<p>applicants are made aware of the conditions</p> <p>All Local authorities to ensure that staff are fully aware of the tenancy strategy and ensure that have a copy of the registered providers tenancy policy to help advise applicants</p>	<p>Council Housing allocation services</p> <p>All Local Authorities included in the Joint tenancy Strategy</p>	<p>Annual review</p>
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The Equality Impact Assessment will be reviewed annually when the strategy is reviewed.

Appendix 3

List of consultees

Anchor Trust

Borough of Poole

Bournemouth Churches Housing Association

Citizens Advice Bureaux - Bridport, Christchurch, Dorchester and District, East Dorset, North Dorset, Poole, Purbeck, Sherborne, Weymouth and Portland

Broadway Park Housing Association

Christchurch Borough Council

Dorset County Council, Supporting People Team

East Boro Housing Trust

East Dorset District Council

Hanover Housing Association

Hastoe Housing Association

Housing Register applicants

Knightstone Housing Association

Magna Housing Association

North Dorset District Council

Poole Housing Partnership

Purbeck District Council

Purbeck Town and Parish Councils

Raglan Housing Association

Radian

Sanctuary Housing

Shelter

Sovereign Twynham

Spectrum Housing Group

Synergy Housing

West Dorset District Council

Weymouth and Portland Borough Council

Some associations placed details of the consultation on their websites

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