

# Executive Decision Report

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## **Changes to the Housing Allocations Policy**

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Decision to be taken by: Assistant City Mayor - Housing

Decision to be taken on: 12 June 2015

Lead Director: Ann Branson



**City Mayor**

## Useful information

■ Ward(s) affected: All

■ Report authors:

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■ Report version number: 2

### 1. Summary

1.1 In October 2014 the Executive considered new guidance issued by Communities and Local Government in June 2012 and December 2013 to housing authorities requiring them to give consideration to reviewing their existing housing allocation policies to ensure social homes go to people who genuinely need and deserve them.

1.2 Stakeholders have been consulted on the Council's proposed changes and feedback is summarised in Appendix B. Overall the feedback is positive with the majority of respondents in favour of the changes. Where there were concerns, mainly over the exclusion of owner occupiers and those with financial resources to secure alternative accommodation, these concerns will largely be met by the existing exemptions part of the policy or considered under exceptional circumstances. On average 65% of applicants rehoused through the Housing Register are in receipt of full or partial housing benefit and won't be affected by the earnings cap.

1.3 Officers therefore propose that the policy changes which were consulted on are adopted without further amendment.

### 2. Recommendation

2.1 It is recommended that the changes to the Housing Allocations Policy as set out in Appendix A are adopted for all new applicants from the date of publication of the Decision Notice.

### 3. Supporting information including options considered:

The changes are in response to guidance issued by Communities and Local Government which makes it clear there is widespread perception that the way social housing is allocated is unfair and authorities should address the concerns that the system favours households who have little connection to the local area and social housing should go to those households in genuine need and not to people who have the resources to consider other housing solutions.

There are two options available:

## OPTION 1

3.1 To adopt some or all the proposed changes to the published Housing Allocations Policy as set out in Appendix A.

OR

## OPTION 2

3.2 Maintain the status quo and make no changes to the published Housing Allocations Policy.

### **3.3 Advantages of Option 1**

1. The changes will give greater preference to people with strong local connections as well as ensuring housing is allocated to those with the greatest need who do not have the resources to explore other housing options.
2. It will benefit those households who need to move closer to their work place or training schemes.
3. More homes may be available for those in genuine need who do not have the financial resources to secure alternative accommodation.

### **3.4 Disadvantages of Option 1**

1. New arrivals to the city will wait longer for social housing.
2. People who own homes or have the financial resources to secure alternative housing will no longer be able to join the housing register except in extenuating circumstances.

### **3.5 Advantages of Option 2**

None.

### **3.6 Disadvantages of Option 2**

1. There may be a perception that housing is allocated to new arrivals to the city ahead of long standing citizens of the city.
2. It may be considered unfair that people who have the financial resources to secure alternate accommodation can have the same priorities on the Housing register as people who do not have the financial resources to secure alternative accommodation.

## **4. Details of Scrutiny**

4.1 Approval was given by Executive to consult on the proposed changes on 16th October 2014.

4.2 All registered social housing providers, housing partners/advocacy groups were notified of the proposed changes and the opportunity to participate in the six week

online consultation exercise. The online consultation was also available to members of the public, including those on the Housing Register, to comment on. (see Appendix B for consultation feedback).

4.3 The report was presented to the Housing Scrutiny Commission on the 3rd February 2015. In summary Members said they were disappointed at the small number of people who had taken part in the consultation, and that it would be difficult to ascertain a true picture of city views from those results. Members said the changes appeared to be draconian and a way of removing people from the Housing Register. They also queried the right for people who owned their own homes to be allowed to go onto the housing register. They added that given the current housing shortage, they agreed the proposals suggested in the report were the best the City Council could provide.

The Commission resolved:

1. that the Commission note the report.

## **5. Financial, legal and other implications**

### 5.1 Financial implications – Pete Coles Principal Accountant (Housing)

This report is concerned with proposals to change the council's housing allocations policy and the requirement to consult with all affected parties. There are no financial implications arising from proposals contained in this report.

### 5.2 Legal implications - Jeremy Rainbow, Senior Legal Officer

Section 169 of the Housing Act 1996 requires the Council, as Local Housing Authority, to "*have regard*" to the statutory guidance when "*exercising their functions under Part VI of the Housing Act 1996*".

It is open to the Council to conclude that particular criteria in the guidance are outweighed by other factors, or that for some other compelling reason the guidance should be modified or dis-applied. It is not, however, open to the Council to ignore the guidance.

The proposed changes to the Allocation Policy required consultation as detailed in 6.1 above in accordance with the requirements of section 166A of the Housing Act 1996.

### 5.3 Climate Change and Carbon Reduction implications - Mark Jeffcote, Senior Environmental Consultant

There are no climate change implications associated with this report.

#### 5.4 Equality Impact Assessment

A detailed EIA has been conducted which included consultation with providers and service users confirming potential impacts by protected characteristics and any mitigating actions deemed appropriate.

The protected groups that were seen to be adversely affected are:

- Race
- Age ( over 55 )

Whilst there may be a greater impact upon new arrivals in the City with the proposed changes to the Leicester City Requirement, the emphasis is to give greater preference to people who have a strong local connection with the City over other people who have recently moved into the City. It will not affect groups such as Asylum Seekers who are dispersed to the City and subsequently receive a positive decision to remain. They will be exempt.

For other groups, who want to live in the City, they can be offered advice and assistance and are entitled to build up a connection with the City by the use of other housing options such as the Private Sector. The Leicester City Requirement is not tenure specific.

To mitigate for those who may have exceptional circumstances and need to live in the City, but do not have a connection, there will a robust appeals process and reviews of decisions.

The guidance strongly encourages all housing authorities to adopt a residency requirement as part of their allocations policy and a reasonable period of residency would be at least two years. The proposal also addresses the concerns and perceptions of customers that the system favours households who have little connection to the local area.

The 'over 55s' were a group that were also highlighted as being adversely affected by the proposals. This was because in the main this group were the owner occupiers, or those who may have the financial resources to secure alternative accommodation. To mitigate for this, those who have extenuating circumstances e.g. someone who requires sheltered housing, or where their current home is not adaptable and they do not have the financial resources to find suitable alternative accommodation will still be able to apply to the Housing Register.

Applicants who have been assessed as having significant affordability issues through no fault of their own will still be able to apply to the Housing Register.

#### 5.5 Other Implications

Local authorities are urged to consider how their allocations policies be used to support

those households who want to work, as well as those who are unable to work but are contributing to their community in other ways, for example, through voluntary work. There is currently no additional consideration given to support working households or households involved in activities which make a significant contribution to the local community.

The proposed change will help to assist people into work or to remain in employment and recognize those who make a significant contribution to local communities and need to be housed in a specific area of the city.

## **6. Background information and other papers:**

- Leicester City Council Housing Allocations Policy
- Allocation of accommodation: Guidance for local housing authorities in England, June 2012
- Providing social housing for local people: Statutory guidance on social housing allocations for local authorities in England, December 2013

## **7. Summary of appendices:**

Appendix A - Summary of recommended changes to the policy following public consultation exercise.

Appendix B - Summary of public consultation exercise and feedback received in relation to the Council's proposed changes.

## **8. Is this a private report?**

No

## **9. Is this a "key decision"?**

Yes

## **10. If a key decision please explain reason**

Yes. This is because these proposals affect all wards of the City

## **SUMMARY OF RECOMMENDED CHANGES**

## **APPENDIX A**

### **1. Leicester City Requirement**

HAP Exec Decision Feb 2015 (V3)

Applicants to the Housing Register must meet the Leicester City Requirement (local connection) by satisfying at least one of the following criteria:

- Applicants living within the city of Leicester must be able to produce documentary evidence that they have used a residential address within the City as their settled home for 2 consecutive years immediately prior to their housing application\*.  
*Current policy is Applicants living within the city of Leicester must be able to produce documentary evidence that they have used a residential address within the City as their settled home for the 12 consecutive months immediately prior to their housing application\*.*
  - Applicants that have previously lived in settled accommodation in Leicester City for 3 consecutive years or more out of the last 5 years\*.  
*Current policy is Applicants that have previously lived in settled accommodation in Leicester City for 2 consecutive years or more out of the last 5 years\*.*
  - Applicants who are either:
    - the primary provider of support to a close family member who has been living in the City for the past 2 years, **or**
    - Primarily receive support from a close family member who has been living in the City for the past 2 years.
- Not currently included.
- Applicants who are currently employed within the city of Leicester and have been for the last 12 months.
  - *Current policy is Applicants employed within the city of Leicester who have a contract or a firm offer of employment within the city for a minimum of 12 months.*

The following criteria relating to the Leicester City Requirement remains unchanged

- People who are aged over 18 and approved as a homeless person under Part VII of the Housing Act 1996.
- Asylum seekers who have been dispersed to the City by the National Asylum Support service (NASS) and whose status changes to that of refugee, or who are awarded exceptional or indefinite leave to remain whilst living in the city.
- Persons who have previously served in the armed forces and they make an application for housing within 5 years of their discharge.
- Prisoners released from prison who meet one of the above criteria prior to them entering service or prison.
- Applicants currently living in unsettled accommodation (e.g. a hostel) within Leicester City who can demonstrate they had previously lived in permanent/settled accommodation in Leicester City for 3 consecutive years or more out of the last 5 years from the last date of their last settled accommodation.

\* Hostels, Nightshelters, 'Care of Addresses' & No Fixed Abode do not meet the requirement, as they are not classified as permanent accommodation.

## 2. Owner Occupiers

People who own homes will be excluded from joining the housing register unless there are extenuating circumstances.

### 3. Financial Resources

Households with a total income of £25k per year or more (single household) or £40k per year or more (joint households) or capital assets of over £50k will be excluded from joining the housing register.

### 4. Community Contributions

Band 3 priority is given to those working households or those in local training schemes who need to move closer to their job/training scheme.



## APPENDIX B

### FEEDBACK FROM THE STAKEHOLDER/PUBLIC CONSULTATION EXERCISE

#### Total Responses Received

	<b>Total</b>	<b>Percent of All</b>
Member of the public	41	79%
Representing an organisation	9	17%
Not answered	2	4%
<b>Total Responses</b>	<b>52</b>	<b>100%</b>

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#### **1. Do you agree with the proposal to change the current Leicester City Requirement?**

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#### Number of Responses Received

Yes	No	Not Sure	Not Answered	Total
<b>37 (71%)</b>	<b>12 (23%)</b>	<b>1 (2%)</b>	<b>2 (4%)</b>	<b>52</b>

#### Feedback

##### Waterloo Housing Group

*'Yes, we agree with the proposals. We feel it is important that mutual exchanges and Homes Direct are promoted as another option for those that may not be able to qualify for housing in Leicester'.*

##### Midland Heart

*'No, housing mobility is really important for employment, social and cultural reasons. Local communities don't respect Local Authority boundaries and often excessive residency requirements can work against achieving best use of housing stock. Furthermore, fears of areas being 'flooded' with out of area applicants rarely materialises. This has been our experience of operating a Regional Choiced Based Lettings Scheme that does not apply any local connection criteria. Evidence suggests urban areas like Leicester gain from wider schemes without local connection'.*

##### Vista Society for the Blind

*'No, people with a disability often require help from family/friends. This is becoming more so with the cuts coming up. With this in mind, people may need to move urgently which*

*they didn't think they would have to do but need to do so they are near to people who can help them. Also particularly people with visual impairment needs, need to be near facilities - GP, Shops, Bus route. Also the type of property needs to be taken into consideration. they do not have the luxury of being able to live anywhere or where ever they are placed'.*

#### General Public (Representative Sample)

*'Yes. In order to be housed in Leicester you should be able to demonstrate strong local connections and these proposals will go some way to ensuring people that have lived and worked in the City are treated ahead of those who may have only been in the City for a short period of time'.*

*'No. I don't agree with increasing the residential requirement but do agree with wavering the requirement for people who want to provide support'.*

*'Yes, I think it is important that preference is given to those who have strong ties to Leicester'.*

*'Yes. I believe that these changes will assist those that are in most need assistance and I am aware there are other things in place when an "Exceptional "Circumstance" applies'.*

*'No, where you've said:*

*"To only consider applicants currently working within the city of Leicester for the last 12 months."*

*This seems incredibly restrictive. If I've understood correctly, does this mean that anyone not working would be unable to apply for social housing? Or even those working but for less than 12 months?*

*I think in this climate where it is difficult to get jobs and even more difficult to get a permanent contract, this is an extremely unfair proposal.*

*To me it seems that those out of work are the ones in most need, and it seems bizarre for the City Council to turn their backs on those people'.*

*'Yes, the proposals seem reasonable in light of the current housing situation our city finds itself in'.*

*'No, Re employment:*

*1. you're working with the assumption that there is the necessary skills and talent in Leicester.*

*2. The selection of candidates based on their base location is unfair in my view. Although I live and work in Leicester; if I was to look for a job elsewhere where there was no jobs in Leicester for me, I would then be disadvantaged for when I looked to apply in Leicester. And with the council being one of the bigger employers, this is limiting my opportunities for seeking work in my home town.*

*Re Residential requirement:*

*Unfair on those who need the support. Why is the council targeting these residents? This requirement should apply to individuals moving for the sake of it, as opposed to those who need to provide support'.*

*'Yes, this helps local people over others who have just come into the city'.*

*'Yes, I agree with the residence part as too many people come to Leicester and within a short period of time want a house from the council.*

*I agree with the second part about employment. People like us who work and are struggling to pay rent and make ends meet, need to be prioritised from those who just claim benefits and do not work.*

*I agree partially to the family association. This is ok if someone is severely disabled and needs additional support and if this has been identified by the various departments e.g. social services. However I feel that many people will use this as an excuse to go up the list, when there is not a real medical issue.*

### **Director of Housing Response**

All comments noted from stakeholder partners and customers.

It is acknowledged that the change to the Leicester City requirement will give greater preference to people who have a strong local connection with the city over other people who have recently moved into the city.

We will not apply the residential requirement to applicants who need to give or receive support to close family members who are living in the City

Current processes for applicants who disagree with the decision that they do not meet the Leicester City Requirement and for those that wish to be considered under exceptional circumstances will continue to be applied.

**In light of the consultation feedback, I recommend no change to the proposal to adopt a revised Leicester City Requirement.**

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**2. Do you agree with the proposal that people who own homes should be excluded from joining the Housing Register?**

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**Number of Responses Received**

Yes	No	Not Sure	Not Answered	Total
<b>39 (75%)</b>	<b>10 (19%)</b>	<b>2 (4%)</b>	<b>1 (2%)</b>	<b>52</b>

**Feedback**

Waterloo Housing Group

*'Yes, it is important that there are fair opportunities for all members of the community, e.g. disabled and elderly'.*

General Public (Representative Sample)

*'Yes, this seems sensible'.*

*'Yes, its fair the owner occupier should not be on Housing register as they could always sell their property and buy another'.*

*'Yes, those who own their own home have the option to sell and move to a bigger property or smaller property. Also those who are already on the list at the moment should be removed'.*

*'No, What about people who have faced a relationship breakdown and are unable to remain in their owned homes but which through the length of time such matters can often take to resolve are unable to sell their property? What if a court order exists that one partner has the right to occupy a property because of children and the property cannot be sold or occupied by the other partner?'*

*'No, as usual this policy will prejudice those who have tried to make a better life for themselves and then find themselves excluded from help when they may need it, while rewarding those who have always expected the state to house them'.*

*'No, people with an outstanding mortgage whose term is coming to an end will have their house repossessed, under the new proposal they will not be able to apply for housing or afford private accommodation. Once property owners know about this rent increases will rocket sky high. This will be a real problem'.*

*'Yes, this should also include people who are in financial difficulties and can't live in their own home anymore but will not have any money after selling to be able to afford another home and can only afford social housing'.*

*'Yes, this is agreeable. A home owner has a home. Why should he want another house?'*

## **Director of Housing Response**

Comments noted from stakeholder partners and customers.

The change will ensure social housing is allocated to those households with the greatest housing need who do not have the financial resources to explore other housing options. Those who have extenuating circumstances e.g. someone who requires sheltered housing, or where their current home is not adaptable and they do not have the financial resources to find suitable alternative accommodation will still be able to apply to the Housing Register.

**In light of the consultation feedback, I recommend no change to the proposal to change the current Housing Allocations policy criteria so that people who own their own homes should be excluded from applying to go on the Housing Register.**

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**3. Do you agree with the proposal that people who have the financial resources to secure alternative accommodation should be excluded from joining the Housing Register?**

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**Number of Responses Received**

Yes	No	Not Sure	Not Answered	Total
<b>33 (63%)</b>	<b>13 (25%)</b>	<b>5 (10%)</b>	<b>1 (2%)</b>	<b>52</b>

**Feedback**

Waterloo Housing Group

*'Yes, it is rare that we have cases that have an income over this level.'*

General Public (Representative Sample)

*'Yes, the allocations policy should be linked to finances, if someone can afford private accommodation based on their finances then social housing should not be made available to this category of person when financially vulnerable people need social housing'.*

*'No, often families earn around the threshold with a few kids and live in private rented but would prefer council accommodation'.*

*'Yes, it is rare that we have cases that have an income over this level'.*

*'Yes, they have more choices where they want to live'.*

*'No, I don't think this considers the increased costs of single parents who may have several children to support and the importance of a stable home environment. Having to potentially move every six to twelve months would be disruptive to their lives and potentially their education'.*

*'Don't know, Whilst I think that it is a good idea for helping people on lower incomes into a home, it isn't clear on what will happen to these households if their income improves over time. If they would then be evicted for example then I think that it could cause unnecessary stress and upset, especially to families'.*

*'Yes, this is common sense. A house holder having that income can rent their home privately. Let social housing be allocated to more financially vulnerable people'.*

**Director of Housing Response**

Comments noted from stakeholder partners and customers.

This change will ensure that social housing is allocated to those with the greatest housing need who do not have the financial resources to secure alternative accommodation in the private sector.

On average 65% of applicants rehoused through the Housing Register are in receipt of full or partial housing benefit. The proposed thresholds for income levels have been set above local average earnings. Applicants who have been assessed as having significant affordability issues through no fault of their own will be able to apply to the Housing Register.

**In light of the consultation feedback, I recommend no change to the proposal to change the current Housing Allocations policy criteria so that people who have the financial resources to secure alternative accommodation should be excluded from joining the Housing Register.**

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**4. Do you agree with the proposal that additional priority should be given to those working households or those in local training schemes who need to move closer to their job?**

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**Number of Responses Received**

Yes	No	Not Sure	Not Answered	Total
<b>34 (65%)</b>	<b>7 (14%)</b>	<b>10 (19%)</b>	<b>1 (2%)</b>	<b>52</b>

**Feedback**

Midland Heart

*'Yes although this is a narrow scope and does not recognise the positive contribution those unable to work make. For example a single parent with young children may not be in a position to work but play a positive role in raising their family and within the local community.'*

Vista Society for the Blind

*'No, not all people with a disability work but still need somewhere to live. People with disabilities need to be near facilities, work places, family friends etc so they can get the help with need.'*

General Public (Representative Sample)

*'Yes, helping people who are helping themselves should be the council's priority.'*

*'No, they should be allowed housing but not priority from those already in the city and working.'*

*'No, people who are in need of social housing should have equal priority, as although it is important for some to live nearer to their work, it is also equally important to others who need to move nearer to family for support, either due to illness, or because they are getting older, etc. These people probably don't work but moving into social housing is just as important to them, if not more so, as they will not have the funds to find an alternative, whereas those who work will have more of a chance to do so.'*

*'Yes, I agree with this people who are working in employment with low incomes need to be recognised for what they do. Too often focus is given to those on benefits whilst we get neglected.'*

*'No, working households are not the ones most in need. I only support this policy change if it refers only to those who are in low income (for example still eligible to receive housing benefit). This policy change will mean that many benefit-dependant families will find themselves stuck in expensive private rent while self-supporting households are able to live in cheap social housing.'*



## **Director of Housing Response**

Comments noted from stakeholder partners and customers.

There is currently no additional consideration given to support working households or households involved in activities which make a significant contribution to the local community.

This change will help to assist people into work or to remain in employment and recognise those who make a significant contribution to local communities and need to be housed in a specific area of the city.

**In light of the consultation feedback, I recommend** no change to the proposal that additional priority is given to those working households or those in local training schemes who need to move closer to their job.

**5. Do you think these proposals will have a negative or positive impact on any particular group of people e.g. due to their age, disability, pregnancy and maternity, race, religion or belief, etc.?**

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**Number of Responses Received**

Yes	No	Not Sure	Not Answered	Total
<b>14 (27%)</b>	<b>25 (48%)</b>	<b>13 (25%)</b>	<b>0 (0%)</b>	<b>52</b>

**Feedback**

Waterloo Housing Group

*'Don't know, It would be useful for some profiling to take place following the implementation of these changes to check whether there is any adverse impact on a particular group'.*

Midland Heart

*'Yes, the increased local connection may have a greater impact on new arrivals in the country that would benefit from the strong community links in the city. The positive contribution requirement could impact on groups less likely to be in employment of training due to their circumstances e.g. disability, pregnancy or caring and parenting responsibilities'.*

Vista Society for the Blind

*'Yes, visually impaired people will need to be near GP, shop, bus routes etc these plans will have a negative effect. they don't always work but they need to be near people not out in the sticks where they can't get anything or go anywhere'.*

The Race Equality Centre Leicester and Leicestershire

*'The proposals to extend the period of local residence will cause indirect discrimination on the grounds of national origin. Recent arrivals in the city are more likely to have migrated from another country than to have migrated to Leicester from another part of UK - consequently the detriment will have, indirectly, been applied on the grounds of national origin, which falls under the category of race within the Equality Act, 2010.*

*In addition, the proposals (a) to only consider those who have been in employment in Leicester for the last 12 months and (b) to make it easier for people to move to a place near to their place of work will have a detrimental impact on the opportunity for people from all minority communities. It should be noted that, according to the 2011 census, 4.8% of the White British population, over the age of 25, were unemployed compared with 8.2% of minority communities. This means that minority communities are nearly twice as likely to be excluded from the housing register on the grounds of unemployment. The disparity is even starker for people of mixed race, other or Black racial origins – the unemployment figure for Black people at the time of the last census was 14.1%.*

*Furthermore, the continuing failure to give priority to those living in over-crowded conditions will also disadvantage people on the grounds of Race. Recent analysis from Manchester University demonstrates that, according to the 2011 census, there is a racial differential for living in over-crowded conditions (one of the accepted indicators within the multiple indicators of inequality). while 5.8% of the white British population in Leicester are living in overcrowded conditions, the overcrowded rate is 23% for all other racial groups; achieving rates of over-crowding of 24.3% for the "white other" population and 27.5% for the Black populations (both of which include significant populations of people who have recently migrated to UK and Leicester).*

*Finally households where there is a significant reliance on welfare benefits (where the benefit cap will not apply) will also be disadvantaged because their benefit income could well be above £50,000 as a family. There is a possibility that this will more likely affect racial minority community households’.*

#### General Public (Representative Sample)

*‘Yes, I would seem that, by only allowing those people who are working onto the register, and by giving extra priority to those working, you will be placing a negative impact on those who are disabled, and those who are pregnant’.*

*‘No, the proposals could potentially cover all of the above groups and therefore everyone will and should be treated equally and fairly’.*

*‘Yes, may impact on race or religion if people are new to the City and are excluded because they do not meet the new Leicester City requirement’.*

*‘No, it will only have a negative impact on those people who do not want to work and just want to live off benefits without lifting a finger. It will have a negative impact for those who come from EU countries expecting a free home.*

*It will have a positive impact on those who are willing to work but just need a little help to get off the ground. By this I mean those who are on low incomes but are still working’.*

*‘Yes, older people due to the capital asset restriction, for example if they are moving nearer to their family so they can take care of them’.*

*‘Yes, the changes have a very negative impact on benefit-dependant families such as single parents. If they have had to move around through no fault of their own because they are stuck in the PRS then they will not be eligible for your list despite needing security and cheaper rent. Also prioritising working families and forcing benefit-dependant families to live in private rent will cost the council much more in housing benefit pay outs’.*

#### **Director of Housing Response**

Comments noted from stakeholder partners and customers.

An equality impact assessment is always completed for major changes to the Housing Register.

Whilst there may be a greater impact upon new arrivals in the City, the proposed change to the Leicester City Requirement is to give greater preference to people who have a

strong local connection with the City over other people who have recently moved into the City. It will not affect groups such as Asylum Seekers who are dispersed to the City and subsequently receive a positive decision to remain. They will be exempt.

For other groups, who want to live in the City, they can be offered advice and assistance and are entitled to build up a connection with the City by the use of other housing options such as the Private Sector. The Leicester City Requirement is not tenure specific.

The proposal will not have a negative impact upon those out of work. It is a proposal that will help to assist people into work or to remain in employment.

The Race Equality Centre's comment that 'the continuing failure to give priority to those living in over-crowded conditions will also disadvantage people on the grounds of Race'. The current Allocations policy does give priority to overcrowded households, the severely overcrowded are recognised in Band 2 and other overcrowded households in Band 3. The policy also helps people who are under occupying social housing to move to smaller homes. The Council recognises the overall problem of overcrowding in the City.