

Equality Impact Analysis Full Tool with Guidance

This Tool has been produced to help you analyse the likelihood of impacts on the protected characteristics – including where people are represented in more than one– with regard to your new or proposed policy, strategy, function, project or activity. It has been updated to reflect the new public sector equality duty and should be used for decisions from 6th April 2011 onwards. It is designed to help you analyse decisions of high relevance to equality, and/or of high public interest

Case law has established that having due regard means analysing the impact, and using this to inform decisions, thus demonstrating a conscious approach and state of mind ([2008] EWHC 3158 (Admin), [here](#)). It has also established that due regard cannot be demonstrated after the decision has been taken. Your EIA should be considered at the outset and throughout the development of your proposal, through to the recommendation for decision. It should demonstrably inform, and be made available when the decision that is recommended. This tool contains guidance, and you can also access guidance from the EHRC [here](#). If you are analysing the impact of a budgetary decision, you can find EHRC guidance [here](#). Advice and guidance can be accessed from the Opportunities Manager: PEIA@lbhf.gov.uk or ext 3430.

Equality Impact Analysis – Housing Estate Investment Plan

The analysis below provides a provisional guide on the impact on the key equality groups of the policy in its current form. In relation to the framework for area-based improvement, a further analysis will be produced following statutory consultation with tenants on this part of the policy. In relation to asset-based limited disposal of HRA voids, the analysis will be finalised in time for publication on agenda for the Cabinet meeting considering it for adoption.

Full Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2011/12, Q2
Name and details of policy, strategy, function, project, activity, or programme	DISPOSAL OF EDITH SUMMERSKILL HOUSE This report recommends the disposal of a council owned tower block, Edith Summerskill House on the Clem Attlee Estate with the proceeds from the sale being utilised for funding future housing and regeneration activity in the borough.

Lead Officer	Name: Ian Ruegg Position: Enabling Manager Email: ian.ruegg@lbhf.gov.uk Telephone No: 020 8753 1722
Date of completion of final EIA	15th August 2011

Section 02	Scoping of Full EIA			
Plan for completion	Should Cabinet approve the recommendation to the disposal of Edith Summerskill House by open market tender, it is estimated the disposal will take 9 – 18 months to complete			
What is the policy, strategy, function, project, activity, or programme looking to achieve?	Lead Officer: Ian Ruegg			
What is the policy, strategy, function, project, activity, or programme looking to achieve?	The Council owns a tower block that is in urgent need of major works to bring it up to decent home standards. It is officers view that the cost of undertaking these works is uneconomic due to is significantly above average cost of works required that would also result in very high leaseholder costs. This is set out in detail in the Cabinet Report (specifically, at sections 2 and 3) By disposing of the site on the open market the property will either be refurbished or demolished and redeveloped to provide high quality 21 st century residential accommodation which will also provide a proportion of affordable housing for borough residents.			
What is the policy, strategy, function, project, activity, or programme looking to achieve?	Age	All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.	/	Neu tral
What is the policy, strategy, function, project, activity, or programme looking to achieve?		Any refurbishment or redevelopment of Edith Summerskill House will require that it is designed to ensure access is provided for all and that the new residential units comply with Lifetime Homes Standards. The London Plan requires 10% of all units to be fully wheelchair accessible, which may be more relevant to older people with age-related mobility impairments	+	M

	<p>The proposed disposal is aimed at refurbishing or redeveloping a vacant Council tower block to provide high quality residential accommodation and therefore replacing a vacant unsightly building. It is likely that the refurbished or redeveloped property will provide a mixture of affordable and private housing that will provide much needed housing for those on low to moderate incomes in the borough. As people tend to begin their careers on lower incomes, this aspect could be said to be positive for younger age groups</p>	+	M
	<p>In addition, the receipt received from the disposal by the Council will be ring fenced for affordable housing or regeneration proposals after the deduction of costs associated with the disposal. As these proposals are not final, they could benefit any age group. As these are not known, they are considered to have a neutral impact at this stage.</p>	/	Neu tral
	<p>The draft planning assessment envisages that 40% of all the units delivered through a refurbishment or redevelopment option would be affordable and a high proportion would be larger family sized units, which would be of benefit to those with children, who may well be younger than the cohort of older people assessed below and would also be of benefit to those under 18, who are not currently protected under Age by the Equality Act 2010.</p>	+	M
	<p>The Council currently has 3,548 households seeking intermediate housing in the borough on its H&F Home Buy waiting lists (source H&F Homebuy Unit June 2011).</p>		
	<p>In terms of mixing tenures, increasing the number of low cost home ownership opportunities should enable more young people to become first-time buyers, as the average age of a first-time buyer without parental assistance has been rising, with the average age now 37 (source: Home Builders Federation, October 2010).</p>	+	M
<p>Older first-time buyers nearing the end of their earning capacity may face obstacles in obtaining a mortgage. However, for older people</p>			

		who are existing home-owners and who may find it equally difficult to obtain a mortgage, low-cost home ownership can provide opportunities. For example, this could be in terms of downsizing for those who are finding it difficult to manage a large home, and who may want to release equity to meet care costs or to support their children to purchase a home. Similarly, low cost home ownership could enable moves for existing older home owners in inappropriate housing, for example due to floor level or internal stairs. In both these scenarios existing older home owners could potentially make an outright purchase of a portion of the property (as little as 25%), and in this way circumvent the need to obtain a mortgage.	+	M
	Disability	All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.	/	Neu tral
		<p>Any refurbishment or redevelopment of Edith Summerskill House will require that it is designed to ensure access is provided for all and that the new residential units comply with Lifetime Homes Standards. The London Plan requires 10% of all units to be fully wheelchair accessible.</p> <p>There is no indication that the proposed disposal will in principle disadvantage disabled people or those with physical or mental ill health</p> <p>People with disabilities do become home owners. The Council has helped 16 households from this group to buy a home since 2007. Data from 2010 shows 99 people with disabilities are active members on the Council's Home Buy Register.</p> <p>The council is currently delivering a number of employment initiatives that provide paid work, (and, in the case of apprenticeships, training and qualifications), to enable residents to sustain employment. These initiatives have been particularly successful in recruiting disadvantaged groups including those described as 'adults with moderate to severe learning disabilities' by the PSA 16</p>	+	H
			-	H

		<p>categorization. Whilst the number is low, 23% of the 2010 Business Apprenticeship scheme and 7% of the LBHF Future Jobs Fund employees are from this group.</p>	+	H
		<p>In addition, to this Hammersmith and Fulham Action on Disability (HAFAD) and H&F Mencap receive council funding to deliver services directly to residents with disabilities and to raise awareness amongst employers of the benefits of recruiting people with disabilities. LBHF Connexions also provides 'access to work' services to disabled residents up to the age of 24.</p>	+	H
		<p>The changes to the mainstream employment support with the introduction of the 'single work programme' this year is designed to ensure that the most disadvantaged receive most support by incentivising service providers with additional payments for securing and sustaining employment for these groups.</p>	+	H
	Gender reassignment	<p>All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.</p> <p>There is very little data on gender re-assignment of Council tenants or members of their household. That said, the effects of this report are expected to be neutral in terms of this characteristic, with nothing on the face of it to suggest a tenant or members of their household stand to lose or gain on account of changing gender from male to female or vice versa or at partial stages in that process.</p>	L	neutral
	Marriage and Civil Partnership	<p>All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.</p> <p>The Council has limited data on the marital status of its tenants or members of their households. That said, the effects of this report are expected to be neutral in terms of this characteristic, with nothing on the face of it to suggest a tenant or members of their household stand to lose or gain on account of whether they are married, single, divorced, cohabiting or in a civil partnership.</p>	L	neutral

	Pregnancy and maternity	<p>All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.</p> <p>The Council has limited data on the proportion of its tenants or members of their households in this equalities category. The effects of this report are expected to be neutral in terms of this characteristic, with nothing on the face of it to suggest a tenant or members of their household stand to lose or gain on account of being pregnant or being in the 26 weeks period post- birth of the child. whether they are married, single, divorced, cohabiting or in a civil partnership.</p>	L	neutral
	Race	<p>All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.</p> <p>Black and ethnic minority groups are disproportionately represented in Council housing. For illustration, 40% of all council tenants identify themselves as from black and ethnic minority groups .The majority of these tenants (66% of the 40%) live on Council estates.</p> <p>There is not an up to date ethnic breakdown of average household income in the borough available. However, those with an income of £30k or more per annum, in other words well above the threshold to access low cost home ownership opportunities accounted for 32.2% of tenants on the Council's largest estates (source: CACI Paycheck 2010)</p> <p>This group is likely to include many households from black and ethnic minority backgrounds who would not otherwise be in a position to own their own home given the high representation of such households in the ethnic profile of Council estates, even allowing for a relatively</p>	L	neutral
			+	M

		lower employment rate amongst ethnic minorities.		
	Religion/belief (including non-belief)	<p>All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.</p> <p>There is very little data on the religious persuasion of Council tenants. As a group Council tenants are ethnically diverse from which it might be inferred that a broad cross-section of world religions are represented in the tenant population. Ethnicity and nationality are not inevitable markers however of a particular faith or of belief or non-belief for that matter.</p> <p>That said, the effects of this report are expected to be neutral in terms of this characteristic, with nothing on the face of it to suggest a tenant or members of their household stand to lose or gain on account of holding a particular religious belief or the lack of one.</p>	L	neutral
	Sex	<p>All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.</p> <p>The proposed redevelopment or refurbishment anticipates that 40% of the new dwellings will be affordable predominantly as intermediate housing such as shared ownership or shared equity.</p> <p>In relation to accessing low-cost home ownership, in terms of income an up to date breakdown of average household income in the borough by gender is not available. However those with an income of £30k or more per annum, in other words well above the threshold to access low cost home ownership opportunities accounted for 32.2% of tenants on the Council's largest estates (around 54% of tenants on the Council's largest estates have a household income above the entry income threshold for low cost home ownership of £19k). (source: CACI Paycheck 2010) This group is likely to include many</p>	L	neutral

		<p>women given they represent the majority of tenants, even allowing for a relatively lower employment rate in the borough for women than for men (60.1% of women aged 16-64 are in paid work compared to 70.1% of men of the same age (source: CACI Paycheck 2010)). In this respect, men could proportionately benefit more than women from low-cost home ownership.</p> <p>Nationally, the gender pay gap varies according to age. For example, women aged 20-29 earn more than men the same age when either full-time or part-time employment are compared. The gender pay gap also varies depending generally on whether work is full-time or part-time, with men earning more in the former and women earning more in the latter. It also varies according to occupation. The gender pay gap for full-time employees in professional occupations is slight, as narrow as 1.6%, while there is a gulf in skilled trades with the pay gap as wide as almost 32%. When looked at across all employment the pay gap, though decreasing, continues to favour men. That said, variation between ages, occupation and in the size of the gap make it difficult to contend that either women or men will generally have more difficulty in purchasing a home on account of gender income disparities. (source: ONS, 2010)</p>		
	Sexual Orientation	<p>All former tenants in Edith Summerskill House have been rehoused permanently in suitable alternative Council accommodation and the disposal of the property will have no impact on them.</p> <p>The Council has limited data on the breakdown of its tenants and their household members by sexual orientation. That said, the effects of this report are expected to be neutral in terms of this characteristic, with nothing on the face of it to suggest a tenant or members of their household stand to lose or gain purely on account homosexual, heterosexual or bi-sexual.</p>	L	neutral
<p>Human Rights and Children's Rights Will it affect Human Rights, as defined by the Human Rights Act 1998? Yes: Article 1 of Protocol 1 (Right to peaceful enjoyment of your property). It is considered that these</p>				

	<p>would be positively impacted by the proposed policy.</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? Yes. The items in bold below would</p> <ul style="list-style-type: none"> ▪ The right to life, survival and development ▪ The right to have their views respected, and to have their best interests considered at all times ▪ The right to live in a family environment or alternative care, and to have contact with both parents wherever possible <p>The draft planning assessment envisages that 40% of all the units delivered through a refurbishment or redevelopment option would be affordable and a high proportion would be larger family sized units, which would be of benefit to those with children and would also be of benefit to those under 18, who are not currently protected under Age by the Equality Act 2010. These benefits may help to uphold their rights as defined by the UNCRC.</p>
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Section 03	Analysis of relevant data and/or undertake research
Documents and data reviewed	<ul style="list-style-type: none"> - Equalities data on Council tenants and stock breakdown by bedroom size March 2011 - Housing demand summary by banding and ethnicity, (LBHF, I-world, December 2010) - H&F Homebuy Unit Waiting List data June 2011 - Annual Population Survey, Office for National Statistics (Office for National Statistics) (March 2011) - Hammersmith and Fulham Borough Profile 2010 - Hammersmith and Fulham Housing Market Assessment, December 2010 - CACI Paycheck 2010 data on household incomes on the Council's 20 largest estates
New research	No new research was undertaken.

Section 04	Undertake and analyse consultation
Consultation	61 of the 62 tenants have already accepted permanent alternative Council accommodation. Council officers will consult with the remaining tenant and the six leaseholders to find permanent solutions to their rehousing.
Analysis	(see above)

Section 05	Analysis of impact and outcomes
Analysis	As per section 04, 61 of the 62 tenants have already accepted permanent alternative Council accommodation. Council officers will consult with the remaining tenant and the six leaseholders to find permanent solutions to their rehousing.

Section 06	Reducing any adverse impacts
Outcome of Analysis	There remains one tenant and six leaseholders to work with, in order to find permanent solutions to their rehousing, and officers will work with them to find solutions, as stated. Officers will be working within Council policy and legal boundaries to do this but cannot detail individual cases as this would not be appropriate or respectful of those individuals' rights to privacy.

Section 07	Action Plan					
Action Plan	Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan

Section 08	Agreement, publication and monitoring
Chief Officer sign-off	Name: Melbourne Barrett Position: Director of Housing and Regeneration Email: Melbourne.barrett@lbhf.gov.uk Telephone No: 0208 753 4552
Key Decision Report	Date of report to Cabinet: 05/09/11 Confirmation that key equalities issues found here have been included: Yes
Opportunities Manager for advice and guidance only	Name: Carly Fry Position: Opportunities Manager Date advice / guidance given: 15.08.2011 Email: PEIA@lbhf.gov.uk Telephone No: 020 8753 3430

