

Initial Screening Equality Impact Analysis Tool

Section 01	Details of Initial Equality Impact Screening Analysis
Financial Year and Quarter	2012/13 / Q1
Name of policy, strategy, function, project, activity, or programme	<p>Building a Housing Ladder of Opportunity</p> <p>The purpose of the Building a Housing Ladder of Opportunity work programme is to set out to interested parties in draft terms the change that the Council is seeking to achieve in its housing approach across a number of work areas. The work programme presently comprises four draft documents: the housing strategy; scheme of allocation; tenancy strategy; and homelessness strategy. Over time, additional documents will be adopted reflecting the broad approach set out in the above mentioned documents. By making the changes sought, the Council believes it is repositioning the local housing authority to effectively take advantage of the freedoms and flexibilities granted under the 2011 Localism Act and a corporate requirement to ensure housing services provided by the council are as efficient and effective as possible. Key audiences for these documents include tenants and residents of the borough; affordable and private housing developers; sub regional partners; the Mayor of London who will be responsible for ensuring the document is in broad conformity with his current (and draft) housing strategic priorities.</p>
Q1 What are you looking to achieve?	<p>There are three primary objectives that the Council is seeking to achieve.</p> <p>Firstly, to put the council's 'borough of opportunity' agenda at the centre of its housing approach, highlighting the Council's housing growth and jobs agenda. Secondly, to take advantage of the freedoms and flexibilities presented by the passing of the 2011 Localism Act. Thirdly, to introduce a housing approach which is more realistic, fair and affordable, reflecting more closely what the Council, as a local housing authority, is able to do in order to meet both housing need and aspiration.</p> <p>The Draft Housing Strategy sets out the overall 'direction of travel' for the housing approach. With creating a ladder of opportunity at its core, the three objectives are to:</p> <ol style="list-style-type: none"> 1. Deliver major economic and housing growth within our opportunity areas 2. Tackle economic and social polarisation through the creation of more mixed and balanced communities where no one tenure dominates 3. Manage a better, streamlined housing service, with a focus on local decision making, delivering outcomes that improve resident satisfaction

The **Draft Scheme of Allocation** sets out the Council's approach to prioritising housing applicants for accommodation. Whilst continuing to meet its statutory homelessness obligations, the Council intends to give greater priority to applicants who are making a community contribution, such as working households and ex armed service personnel.

The **Draft Tenancy Strategy** sets out the Council's approach to flexible tenancies. This document highlights a range of fixed terms – from one to five years – which the Council intends to grant in its role as a registered provider of affordable housing. It also provides guidance to other registered providers, principally housing associations, on fixed term lengths and levels of affordable rent that should be charged in the borough. Some tenancies will still be granted on a secure or assured basis.

Finally, the **Draft Homelessness Strategy** sets out how the Council intends to meet its homelessness obligations (including preventative work) in the new operational environment.

It should be noted that there will be no direct impacts arising from the approval by Cabinet (or Cabinet Briefing) of the work programme documents. These are consultation documents which are intended to receive comment and contributions from interested parties in Hammersmith & Fulham and other parties such as the Mayor of London who will decide whether the documents are in broad conformity with his Revised London Housing Strategy.

It is the Council's intention to seek approval from Cabinet in September/October 2012 when a full equalities impact assessment (if required) will be submitted.

Of particular importance is the need to impress upon interested parties the intention of the Council to develop and implement a community contribution orientated scheme of allocation which includes objectives such as giving greater housing priority to working households; ex-service personnel; foster carers; police community support officers; and other workers who make a contribution to the local economy and community); progressing its growth ambitions in the five regeneration opportunity areas and on other 'Rest of Borough' sites; to reinforce its low cost home ownership agenda for hard-working households; ensuring that the Council meets its statutory homelessness obligations.

The development and implementation of a successful Building a Housing Ladder of Opportunity approach will be critical to the Council realising its broader regeneration objectives which are intended to have medium to long term direct and indirect positive impacts for Hammersmith & Fulham's residents.

**Q2
Who in the main will
benefit?**

In terms of identifying beneficiaries to the overall approach, the structure below follows the Draft Housing Strategy strands with commentary on how the other three documents (and related documents such as the Council's Core Strategy and Borough Investment Plan) sit within the overall approach identified.

Guiding and prefacing the Council's proposed housing strategy approach is **Building a Housing Ladder of Opportunity**. By this is meant affordable rented housing being considered a stage rather than a destination point for current and future housing applicants. The Council's ambition is that residents have as many opportunities as possible to access affordable home ownership. In tandem, the Council wishes affordable housing to be seen as part of the wider Hammersmith & Fulham housing market and that a wider number of people from different backgrounds gaining access to it. In tandem, the Council also wishes to ensure that those who are prioritised for affordable housing meet requirements to make a community contribution. The Council intends to continue meeting its statutory homelessness obligations but intends also to use the private rented sector to a greater degree to discharge its homelessness duty when it is legally able to.

1. Deliver major economic and housing growth within our opportunity areas

Key to the Draft Housing Strategy is its contribution to the Core Strategy (Oct 2011) objectives of delivering 14,400 additional homes and 25,000 new jobs, principally in the five regeneration opportunity areas and via its Local Housing Company. This objective is also detailed in the Borough Investment Plan (Dec 2011). It is a strategic priority for the Council to ensure that more local people gain advantage from new job opportunities that are created over the 2012/32 Core Strategy period. The Council's Scheme of Allocation is proposing to give greater priority to working households and officers will be seeking to ensure there is a connection between the Council's growth agenda and the ability of local people in affordable housing being able to access available opportunities.

2. Tackle economic and social polarisation through the creation of more mixed and balanced communities where no one tenure predominates

Over the next twenty years, the Council is aiming to deliver 60% market housing (8,640 homes) which may include some student accommodation with the remaining 40% of that total (5,760 homes) provided as affordable housing. The market housing will be either for market ownership or rent. The large majority of the new housing (13,200 homes) will be delivered in the five regeneration opportunity areas identified in the Council's Core Strategy. In addition, the Council in its Draft Housing Strategy seeks new housing to meet the standards set out in the Mayor of London's Interim Housing Design Guide and also more affordable family accommodation. The Council will also seek the delivery of the Lifetime Homes Standards and 10% wheelchair accessible homes.

In terms of the kind of affordable housing that will be developed, the Council's aspiration is to maximise low cost home ownership opportunities for working households who live and work in the borough. As part of its Draft Scheme of Allocation, the Council intends to give greater priority to a wider range of housing needs who historically have not sufficiently high enough priority to access affordable rented housing. The Council will continue to meet its statutory homeless obligations and give priority to reasonable preference groups. As a result of the aforementioned intention to give greater priority to working households and those making other community contributions, it is expected that this will reduce economic and social polarisation and will help deliver more mixed, balanced sustainable communities. In tandem, the Draft Tenancy Strategy introduction of flexible tenancies is intended to ensure that housing is allocated and retained by those who are in greatest need. The Draft Homelessness Strategy is intended to ensure that homelessness needs are met in an efficient and effective fashion, underpinned by the Council's continuing statutory obligations towards vulnerable individuals who are accepted as homeless.

3. Manage a better, streamlined housing service, with a focus on local decision making, delivering outcomes that improve resident satisfaction

This element of the housing approach emphasises is highlighted the comprehensive range of housing services that the Council provides, setting out particular initiatives such as the Council's intention to develop and implement an asset management strategy. This will help ensure the stock is effectively and efficiently managed to ensure residents live in homes that meet modern day living standards; are fit for purpose; attractive to live in; and, are cost effective to maintain. A key aim is to increase resident satisfaction with repairs; resident involvement; and, improving the effectiveness of dealing with anti-social behaviour.

In summary, there are a wide range of benefits to the Council's proposed approach. In terms of over-arching themes, the Council wishes to increase the amount of affordable housing – for rent and ownership - being delivered and improving the quality of the product itself. It also wishes to see more unemployed people, particularly those in social housing enter (or re-enter) the world of work in order to reduce the wider associated disadvantages, e.g., poor health, lower educational attainment, etc. The Council also wishes to deliver major interventions in the five identified opportunity areas to help deliver regeneration to the places and communities which need them. As stated in the EqlA relating to the Borough Investment Plan (Cabinet 5 December 2011): “the wider impact of delivering these regeneration projects will be significant. Three of the five areas – White City; Earl's Court; and Park Royal – host some of the most disadvantaged communities in the borough and a key objective is to ensure that wider regeneration benefits – improved transport infrastructure; over 25,000 new jobs; improved physical environments; new retail and office space; replaced and/or improved affordable housing - improve the life chances of disadvantaged people.”

Historically, affordable rented housing has been allocated on the basis of need in the last 30 or so years, and

inevitably disadvantaged groups have been disproportionately over-represented in this sector. These include individuals/households such as the elderly; Black, Asian and minority ethnic (BAME) groups; single parent households; people with dependency issues (e.g., drugs, alcohol). Therefore, where new affordable rented housing is developed, being able to allocate new homes to disadvantaged groups will have a positive equalities impact. Included under the affordable rented housing category is supported housing (where there are services provided to 'support' vulnerable households live in the community) and also older people's sheltered housing (which may or may not include onsite warden support). The Council expects that such housing will be provided in the new regeneration opportunity areas. The Council's is at the early stages of reviewing the provision of its current sheltered housing portfolio and other forms of housing for particular needs groups under the supported housing heading. It should be noted that the Government's Affordable Rent housing model (effectively a replacement for the social rent model) will involve charging rents at closer to market rent levels. There is a risk that if the maximum rent increase permissible under the new proposals is applied, some larger family sized accommodation would be unaffordable to both non working and working households. An additional consideration will need to be given to the implementation of the Government's Universal Credit proposals which are due to be implemented from October 2013 onwards. Intermediate affordable housing is that which is allocated to households on low to medium incomes is promoted in the Draft Housing Strategy. It can take the form of shared ownership; shared equity; discount market sale; sub market rent housing. This is an effective housing product which enables people working in public sector and for other essential service providers to gain stable and long term housing accommodation. This will have positive equality impacts on the basis that minority groups are actively sought to take advantage of new intermediate housing products and the impacts monitored and mitigating action undertaken. Given households from disadvantaged groups are generally on lower than average incomes (and often benefit dependent), such households are less likely to take advantage of such products.

For the purposes of consultation, we have produced an Initial EIA (this document) of what we think the impacts will be on various groups. We welcome comments from the public and interested parties on this initial analysis during consultation. The results of those comments will be used revisit this analysis and to conduct a more in-depth EIA.

Age	The development of new housing – market and affordable – that meets modern day standards will improve the choice of housing that households will be able to access. Where large family affordable accommodation is provided, this is considered to improve the educational attainment for children 4-18 years olds wishing to study. As people under the age of 18 are not presently covered under Age as a protected characteristic in the Equality Act 2010, this is also given under Children's Rights (below).	<i>H</i>	+
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		Where better quality older people's affordable housing is provided this will create improved opportunities and lifestyle for 65+ year old households. Where improved choices can be made for older people, this can have the effect of freeing up larger, under-occupied housing where older people's children have left home, meaning that younger families can benefit from leaving over-crowded accommodation. Older people would not be required to leave their current accommodation under current secure and assured tenancies. There is also reference in the Draft Scheme of Allocation regarding connecting job offers with housing offers. This will require further development but has the potential to help younger people enter and stay in the 'world of work' which will have positive impacts. Tenancies are proposed to be granted on a fixed term basis and therefore there will be greater flexibility to assess people's needs on a periodic basis. Applicants seeking council sheltered housing will be granted secure tenancies and the council will expect private registered providers to grant assured tenancies in the same situation.		
	<i>Disability</i>	The development of new housing – market and affordable – which delivers 10% wheelchair accessible housing and delivers the “Lifetime Homes Standards” will have direct and positive impacts on disabled people's quality of life, regardless of age. Implementing these design standards will also have the impact of ‘future proofing’ homes, allowing people as they get older and/or become disabled to able to stay in their own homes with relatively minor adjustments being required. The Lifetime Homes requirement as per planning requirements will also benefit people who are not disabled at present but who become disabled, for example, those who acquire age-related mobility impairment(s).	<i>H</i>	<i>+</i>
	<i>Gender reassignment</i>	No impacts, negative or positive, are expected to be experienced by individuals who are in the process of transitioning from one gender to another.	<i>L</i>	<i>Neutral</i>
	<i>Marriage and Civil Partnership</i>	No impacts, negative or positive, are expected to be experienced by people who are married or in a civil partnership.	<i>L</i>	<i>Neutral</i>

	<p><i>Pregnancy and maternity</i></p>	<p>Where pregnant women are living in good quality, secure, warm and weathertight accommodation, it can be expected that this will have a positive impact on their social and health well-being. The measures for protecting victims of domestic violence may have more of an impact on pregnant women and those who have just given birth, as it is well documented that women are at increased risk of domestic violence during pregnancy and that this can lead to miscarriage, low birth weight, and death of a mother or her (unborn) baby. As the Council will provide also service to women who have already had children, it is of high relevance to this protected characteristic. Some key statistics include:</p> <ul style="list-style-type: none"> ▪ More than 30% of [domestic violence] cases start during pregnancy ▪ 40-60% of women experiencing domestic abuse are abused during pregnancy ▪ More than 14% of maternal deaths occur in women who have told their health professional they are in an abusive relationship ▪ In over 50% of known domestic abuse cases, children were also directly abused <p>[CEMACH, p174: 2007, and DoH, p9: 2005]</p> <p>Domestic violence and pregnancy</p> <ul style="list-style-type: none"> ▪ Confidential Enquiry into Maternal and Child Health (CEMACH), <i>Saving Mothers' Lives: Reviewing maternal deaths to make motherhood safer – 2003-2005</i>, http://www.cemach.org.uk/getattachment/26dae364-1fc9-4a29-a6cb-afb3f251f8f7/Saving-Mothers'-Lives-2003-2005-(Full-report).aspx, (December 2007) ▪ Department of Health (DoH), <i>Responding to Domestic Abuse: A handbook for health professionals</i>, http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@d h/@en/documents/digitalasset/dh_4126619.pdf, (December 2005) 	H	+
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	<i>Race</i>	<p>The provision of new affordable rent housing is expected to have a positive impact on the quality of life for groups from Black, Asian and minority ethnic backgrounds. Historically, such housing has been allocated on the basis of need and therefore the positive impacts associated with high quality, well designed, spacious housing which reduces fuel poverty will have a beneficial impact on this group. It should be noted that under the Localism Act proposals, greater flexibility is to be granted to local authorities to allocate new affordable rent housing (and the re-letting of existing housing). In the event that affordable rent housing is allocated to (say) economically active households as opposed to benefit-dependent housing, then the positive impacts described above will be diluted.</p> <p>Under the Council's adopted Core Strategy, Policy H5 provides for working with the Royal Borough of Kensington and Chelsea with regard to the gypsy and traveller site, and gypsy and traveller accommodation needs. Building a Housing Ladder of Opportunity does not propose to amend this policy and it is considered that the overarching policy and its supporting documents are in compliance with the Core Strategy in this regard. Further, the Council notes the most recent DCLG progress report and commitments 12 and 13, which it considers to be in line with Core Strategy Policy H5. As such, there is no discernible impact on this group arising from Building a Housing Ladder of Opportunity and supporting documents.</p> <p>Race, and gypsy and traveller needs</p> <ul style="list-style-type: none"> ▪ DCLG: <i>Progress report on the ministerial working group tackling inequalities experienced by Gypsies and Travellers</i>, http://www.communities.gov.uk/documents/planningandbuilding/pdf/2124046.pdf, (April 2012) 	<i>H</i>	<i>+</i>
	<i>Religion/belief (including non-belief)</i>	No impacts on the basis of gender, negative or positive, are expected to be experienced by these groups.	<i>L</i>	<i>Neutral</i>
	<i>Sex</i>	<p>Where overcrowding is reduced, positive equality impacts can be expected to be experienced by adult household members</p> <p>The measures contained within the Draft Housing Scheme of Allocation to provide for victims of domestic violence are of high relevance to women</p>	<i>M</i>	<i>+</i>

		(as it is usually women and children who are victims) and will have a positive impact where those measures are required. Men are not excluded from these measures where they are victims but the relevance is proportionately less. Those who perpetrate violence against their partners may be evicted and lose their tenancies, and this will be negative for those people but positive for the victims who will be more safe. This will have more of a relevance to men as they are usually the perpetrators of violence against women and children, but this would apply to any perpetrator of domestic violence. This is considered to be a proportionate means of achieving a legitimate aim of reducing crime, which is a Council priority.	H	+
	<i>Sexual Orientation</i>	No impacts on the basis of sexual orientation, negative or positive, are expected to be experienced by these groups.	L	<i>Neutral</i>

Human Rights and Children's Rights

Will it affect Human Rights, as defined by the Human Rights Act 1998?

No

Will it affect Children's Rights, as defined by the UNCRC (1992)?

Yes: the right to (life, survival, and) development, as well as those rights for disabled children. The development of new housing – market and affordable – that meets modern day standards will improve the choice of housing that households will be able to access. Where large family affordable accommodation is provided, this is considered to improve the educational attainment for children 4-18 years olds wishing to study. The improvements to housing stock brought about by the lifetime homes requirement (as above) will also benefit disabled children. Where children are kept safe from harm (domestic violence), this will also help to uphold their rights to life, survival and development.

**Q3
Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?**

Yes

The development and implementation of the housing strategy; scheme of allocation; tenancy strategy and homelessness strategy draft documents will help provide the basis for making positive contribution to equalities. The over-arching objective of the draft housing strategy is to increase the amount, quality, and accessibility of affordable housing in the borough (as well as improvements in housing management services).

	<p>This will help improve equality outcomes for the majority of the groups identified above. These documents should be seen as companion documents to the Local Development Framework Core Strategy and the Borough Investment Plan, providing the basis for making a positive contribution to equalities. The development of new affordable housing and a changed approach to who occupies the housing over the medium to long term will help meet affordable housing need; provide a platform for individual and community well-being and sustainability; and, introduce greater aspiration into the affordable housing sector. There will be no direct impacts arising from the publication of these documents for consultation. However, it is likely that further impact assessment work will need to be undertaken on the Housing Strategy; Scheme of Allocation, Tenancy Strategy, Homelessness Strategy draft proposals, to more fully understand what impacts may arise.</p>
<p>Q4 Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity, and/or adversely impact human rights?</p>	<p>No</p>