

Full Equality Impact Analysis Tool

Overall Information	Details of Full Equality Impact Analysis
Financial Year and Quarter	2012/13 Q3
Name and details of policy, strategy, function, project, activity, or programme	<p>Title of EIA: Building a Housing Ladder of Opportunity</p> <p>The purpose of the Building a Housing Ladder of Opportunity work programme is to adopt a set of documents that are designed to help the Council achieve a change in its housing approach across a number of work areas. The set of documents comprise the:</p> <ul style="list-style-type: none"> - Housing Strategy - Housing Allocation Scheme - Tenancy Strategy - Homelessness Strategy <p>There is an additional housing strategy annex which includes references and evidence to support the Housing Strategy content. The four documents are described as ‘the strategy documents’ in this EqIA. Each of these documents make separate but related contributions to the Council’s new housing agenda. The Housing Strategy sets the overall ‘direction of travel’ for other three strategy documents. The development and regeneration objectives of the Housing Strategy reflect the Council’s Local Development Framework Core Strategy (Oct 2011) objectives and the Borough Investment Plan (Dec 2011), both of which have been approved by Cabinet.</p> <p>By making the changes sought, the Council is seeking to reposition the authority to effectively take advantage of the freedoms and flexibilities granted under the 2011 Localism Act and a broader corporate requirement to ensure housing services provided by the council are as efficient and effective as possible. If agreed by Cabinet, the large majority of the changes, principally through the operation of the Housing Allocation Scheme, are planned to come into effect from April 2013. The second recommendation of the report gives delegated Authority to the Cabinet Member for Housing in conjunction with the Executive Director of Housing and Regeneration to consider an updated Equality Impact Assessment and to make such minor changes to the documents annexed to this report as they consider necessary.</p>

Lead Officer	Name: Aaron Cahill Position: Temporary Project Officer (Policy) Email: aaron.cahill@lbhf.gov.uk Telephone No: 0208 753 1649
Date of completion of final EIA	28 September 2012

Section 02	Scoping of Full EIA
Plan for completion	Timing – The EqIA process has informed recommendations in the Cabinet Briefing Report Resources – Officer time; data and statistics set out in the Housing Strategy Annex; additional housing allocations information recently available from the Council’s Performance Team; Borough-wide socio-economic statistics drawn from corporate sources. Lead Officer – Aaron Cahill
What is the policy, strategy, function, project, activity, or programme looking to achieve?	<p>There are three primary objectives that the Council is seeking to achieve: 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>In that vein, the Council has prepared and consulted on four key documents that will change the approach as set out above. These are documents that have received comment and contributions from interested parties in Hammersmith & Fulham and other parties such as the Mayor of London whose representatives have offered a broadly positive view about the documents’ broad conformity with his latest London Housing Strategy.</p> <p>The 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 **Housing Allocation Scheme** 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 **Tenancy Strategy** sets out the Council's approach to flexible tenancies. This document highlights a range of fixed terms – from two 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 'lifetime' basis.

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

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 equality impacts for Hammersmith & Fulham's residents.

Of particular importance is 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; other workers; and volunteers who make a contribution to the local economy and community which features in the Housing Allocation Scheme; progressing its growth ambitions in the five regeneration opportunity areas and in other 'Rest of Borough' sites which features in the Housing Strategy; to reinforce its low cost home ownership agenda for hard-working households which also features in the Housing Strategy; and, ensuring that the Council meets its statutory homelessness obligations which features in the Housing Allocation Scheme and the Homelessness Strategy. There will be positive and negative equality impacts that may arise from each of these proposed activities which will need to be monitored with any negative impacts mitigated, where this is possible and assurance given that where this is not possible, negative impacts on protected group(s) are not unlawful.

The remainder of this EqIA reviews the equality impacts of each of the four strategy documents.

The **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:

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

On the first objective, it is worth noting that the key strategy document in relation to new housing supply is the Local Development Framework (LDF) Core Strategy, adopted by Cabinet in October 2011. The sections in the Housing Strategy on new supply and the regeneration areas are a derivative of LDF Core Strategy housing policies, to help ensure there is alignment with documents already adopted by the Council. This includes the Borough Investment Plan adopted by Cabinet in Dec 2011.

Age	One of the few changes to the draft Housing Strategy related to the need for a more developed and integrated approach to the current and future housing needs of the vulnerable, the elderly and disabled people. The Strategy commits to adopting such an approach to identify and meet the needs of these equality groups. The Housing Strategy confirms the LDF Core Strategy policy to deliver housing that meet people's housing needs who need care and support, Housing Policy H4. This will include older people and also those who may have housing needs due to physical or learning disabilities. Increased supply of smaller accommodation will have positive impacts for applicants who are seeking small accommodation who form the largest cohort of need on the current Housing Register.	H	+
Disability	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. Implementing the design standards identified in the Mayor of London's Draft Housing SPG (which incorporates the Housing Design Guide) will also have the impact of ‘future proofing’ homes, allowing people as they get older and/or become disabled to be able to stay in their own homes with relatively minor adjustments being required. The Lifetime Homes requirement as per planning policy will also benefit people who are not disabled at present but who become disabled, for example, those who acquire age-related mobility	H	+

		impairment(s). Taken with the Council's new statutory health role there is further work required to develop the Council's approach to the needs of the disabled (including people with learning disabilities), vulnerable and the elderly referenced in Section 7 of the Action Plan of this EqIA. This will be completed by HRD, by April 2013.		
	Gender reassignment	The Housing Strategy is not expected to have negative or positive impacts on people who have transitioned or are transitioning.	N/A	N/A
	Marriage and Civil Partnership	The Housing Strategy is not seeking to deliver a specific service for married people or people who are civil partners so this is not relevant to this protected characteristic.	N/A	N/A
	Pregnancy and maternity	The Housing Strategy reflects Draft Development Management Plan proposals to maximise the amount of affordable family housing to be delivered through planning policies. It is clear from current evidence that there is a relatively small proportion of affordable family rented housing that is available to the Council to nominate households to. Of the 646 homes that the Council nominated to in 2011/12, just 92 had 3 or 4 bedrooms. Whilst demand for affordable housing for rent is largely for 1 bedroom and 2 bedroom homes due to homelessness demand, because of the limited supply of larger accommodation, the wait for larger accommodation is disproportionately longer. Therefore, increasing the supply of affordable family housing will have positive impacts on this protected group. Lone parents are a significant cohort of need in the accepted homelessness cohort of need.	H	+
	Race	The Housing Strategy reflects the Core Strategy target to deliver 720 homes per annum and that 40% of the housing should be affordable. The affordable housing delivered is planned to be for both affordable home ownership and Affordable Rent. As set out in the Homelessness statistics in the Housing Strategy Annex, the homelessness approaches and acceptances from ethnic minority groups exceed that from white groups, excluding 'Other Total' and where ethnicity was not stated. In this respect, the Strategy should have a positive impact on all race groups, but that impact will be proportionately more on BME Groups in line with their presence in the homelessness statistics.	H	+
	Religion/belief (including non-belief)	The Housing Strategy is not expected to have any impacts on people according to their religious beliefs.	L	Neutral

Sex	The Housing Strategy is intended to increase the amount of affordable housing for both intermediate and affordable rented purposes. In March 2012, 57% percent of the main applicants were women. On the Housing Register, 63% of the main applicants were women. Increasing the provision of affordable housing – bother intermediate and affordable rented – are likely to have positive impacts on men and women but on women proportionately more in line with their representation in the statistics.	H	+
Sexual Orientation	The Housing Strategy is not expected to have any impacts on lesbian, gay, bisexual or heterosexual people.	L	Neutr al

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)?

No

The **Housing Allocation Scheme** sets out the Council’s approach to prioritising housing applicants for accommodation. The Council will only be permitting applicants who meet one or more of the ‘reasonable preference’ criteria and a five year local connection to qualify for the Housing Register. **By using these two qualifying criteria, the Council is in effect only giving priority to housing applicants who have a local connection with the borough and are in housing need, as defined in legislation. The over-arching equality impacts are likely to be positive as those who are in housing need are more likely to be drawn from the protected groups than under current Housing Allocation Scheme.** 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 Council also intends to change the council’s choice based lettings approach to a ‘assisted choice’ approach which is broadly similar to historic ‘direct lettings’ approaches, with the caveat that successful applicants will be made two offers (with discretion for a third). The Council also intends to adopt Local Lettings Plans in specific areas designed to address certain issues such as overcrowding; high concentrations of poverty; and local ‘swaps’ of homes to help improve local sustainability. The intention of the Council to continue adopting Annual Lettings Plans is set out in the Housing Allocation Scheme. Such Plans identifies quotas for cohorts of housing needs, e.g., supporting people; homeless; children leaving care; households in work; etc. Where adjustments are made that clearly advantage certain (non protected groups to the detriment of other (protected) groups, then these impacts will need to be

monitored and evaluated. A key element of the Housing Allocation Scheme involves greater use of private sector accommodation which the council intends to use to discharge its homelessness duties (also featured in the homelessness strategy sections below). Equality impacts relating to the Council's homelessness obligations are set out in the final part of this section of the full screening document. The earlier referenced scoping work on the needs of the vulnerable, elderly and disabled is primarily relevant to the Housing Allocation Scheme but has links with the Tenancy Strategy and Homelessness Strategy. Taken with the Council's new statutory health role there is further work required to develop the Council's approach to the needs of the disabled, vulnerable and the elderly referenced in Section 7 of the Action Plan of this EqIA. This will be completed by HRD by April 2013.

Age	<p>A relatively large proportion of lettings are available annually for older people for sheltered housing purposes. For 2009/10 such lettings comprised 126 sheltered homes out of a total of 990 homes for rent; for 2010/11, 125 out of 911; and, in 2011/12, 109 out of 646. On 1 April 2012, some 339 households were on the housing register seeking sheltered accommodation. The Council expects this demand to continue but has undertaken a review of its sheltered housing stock to ensure that the stock available continues to be fit for purpose. One of the proposals in the Housing Allocation Scheme is designed to facilitate a closer working relationship with the Council's Adult Social Care staff to help ensure that older applicants who may have other housing or health needs are able to access sheltered housing. This is intended to secure accommodation for a wider cohort of housing need beyond people who meet a simple age criteria, whilst also reducing reliance on private sector providers. The Council expects the move to 'Assisted Choice' to help older people with their housing choices as ICT based approaches are perceived to be difficult for this age group to operate.</p> <p>For younger people, it is expected that some young people in the training and employment community group will gain higher priority for accessing affordable housing. Through the Annual Lettings Plan, the Council expects that certain cohorts of need, e.g., supported housing needs; children/young adults leaving care; will continue to receive affordable housing, but may in some instances be allocated private rented or leased accommodation. Subject to the publication of Government Regulations on suitability of accommodation, this may have positive or negative impacts on those affected, depending on individual circumstances.</p>	H	+
		H	+ and -

		For younger people, the number of 18-24 year olds allocated homes in 2011/12 totalled 106 (16%) out of a total of 646. Reviewing the data available from the Homelessness Strategy, it can be estimated that approximately half of this cohort of need will have accessed the housing register through a homelessness acceptance. The Council intends to use private rented housing (subject to publication of the Government's Homelessness Order) to discharge its homelessness duty. Any such housing is likely to need to meet (based on the Draft Order's content) suitability criteria in regarding its quality and location. Therefore any such housing will need to be chosen with care in order to meet statutory requirements which will be based on the location of the homes and their quality.		
	Disability	The move to 'Assisted Choice' should help the Council identify housing that is more suitable for disabled applicants' needs, using discretion where necessary. Presently, there are recorded 311 household members out of a total of 22,178 members on the Housing Register (i.e., either applicants or household members who are on the c 10,000 list). The reported level of need is considered to be under-reporting the likely level of housing needs. Further work will need to be undertaken to ensure information is accurately recorded as part of the new Housing Allocation Scheme implementation process. This will need to occur at the point of where new housing register applications are completed and annually updated. These will form part of the review exercise identified in the Action Plan at the end of this assessment.	H	+
	Gender reassignment	The Housing Allocation Scheme is not expected to have any impacts on people who have transitioned or who are transitioning.	L	Neutral
	Marriage and Civil Partnership	The Housing Allocation Scheme makes clear in the sections on tenancy succession that a spouse or a civil partner and a person who lives with the tenant as if they were a spouse or a civil partner should have tenancy succession rights, subject to meeting residency criteria.	H	+
	Pregnancy and maternity	Housing allocation priority through the homelessness route for accommodation is set out in the final part of this section of the full screening document.	H	+

	Race	<p>Given the high levels of deprivation that some ethnic minority households continue to experience it is inevitable that ethnic minority groups are highly represented in the allocation of affordable rented housing. In 2011/12, 646 allocations were made of which a total of 52% were from ethnic minority groups and 44% from white groups (with 4% not stated). The over-representation of ethnic minority groups seeking housing support is illustrated by the profile of those currently on the housing register. Out of the total of 10,115 applicants reported on 12 September 2012, 52.4% were from black, Asian or other ethnic minority groups; 37% were from white groups, with 10.6% ethnicity not stated. The current ethnic minority 'need profile' of the current housing register can be described as being broadly proportionate to the profile of allocations in the 2011/12 year.</p> <p>The Council will monitor and evaluate impacts that may arise from the implementation of the Housing allocation Scheme. As specified in the introductory text, the switch to a Housing Allocation Scheme which centres on giving priority for reasonable preference groups and people with a local connection, the equality impacts are likely to be positive. However, with the introduction of the community contribution, the Council will need to monitor and evaluate what positive and negative impacts are experienced and what (if any) mitigating actions need to be put in place.</p> <p>Where the Council adopts local lettings plans and seeks to draw applicants who may not necessarily meet the reasonable preference criteria from the Home Buy Register for short term tenancies, then the Council will monitor what impacts – negative or positive - this may have on the ethnic profile of applicants who are accessing affordable rented housing.</p> <p>It should be noted that of the 4,143 people registered on the Home Buy Register in March 2012, 60.8% were from white groups; 35% from ethnic minority groups; 4.1% not stated. Where there are allocations of rented housing made from the Home Buy Register, they are statistically more likely to be from white backgrounds. Any local lettings plan approach will be monitored</p>	H	+

	and evaluated carefully. Allocating more rented housing from the Home Buy Register could have a negative impact on ethnic minority groups. Following the introduction of the Housing Allocation Scheme, lettings trends will need to be monitored and evaluated to assess impacts, and acted as necessary.	M	-
Religion/belief (including non-belief)	The Housing Allocation Scheme is not expected to have any impacts on people according to their religious beliefs.	L	Neutral
Sex	The 646 Allocations in 2011/12 by gender (based on main applicant) were as follows: 372 (58%) to women, 274 (42%) to men. The Council will monitor and evaluate the impact of the new Housing Allocation Scheme on this equality group closely, drawing on data for 2012/13 and for previous years. The Housing Allocation Scheme gives high rehousing priority to victims of domestic violence. Allocating more rented housing from the Home Buy Register could have a negative impact through differential levels of income.	H M	+ -
Sexual Orientation	The Housing Allocation Scheme makes clear in the sections on tenancy succession that a civil partner and a person who lives with the tenant as if they were a civil partner should have tenancy succession rights, subject to meeting residency criteria.	H	+

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)?

No

The **Tenancy Strategy** sets out the Council’s approach to flexible tenancies. This document highlights a range of fixed terms – from two 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 (i.e., lifetime basis). Private Registered Providers (usually housing associations) are required to have due regard to the local housing authority’s Tenancy Strategy when formulating their own tenancy and tenancy renewal policies. The large majority of the impacts described below relates to how the Council in its registered provider role intends to change the tenancies it intends to grant. It should be noted

that many Private Registered Providers (usually housing associations) intend to continue granting 'lifetime tenancies' and therefore monitoring and evaluation of offering and take up of such tenancies will need to be undertaken. On the basis of a 'lifetime' tenancy being more attractive to applicants, the Council will need to ensure that it is not giving undue preference to certain groups of applicants when making offers of a tenancy to applicants.

Age	The Tenancy Strategy proposes to continue granting 'lifetime' secure tenancies to applicants who are over 65 years old which will be positive as they will see no change in the policy for them.	H	+
	The strategy proposes to grant 2 year tenancies to applicants who are between the ages of 18-25, unless they are leaving local authority care and entitled to receive services under the Leaving Care Act and so the impacts will be both positive and negative for this age group. 2 year tenancies are proposed for this group to help ensure they are able to take on the responsibilities associated with sustaining a tenancy which is likely to be renewed if the tenancy is managed well.	H	+ and -
	The Tenancy Strategy proposes to grant 5 year tenancies to general needs applicants aged 26-64. There is a clear possibility that a 2 year tenancy could be perceived to have a negative impact on younger people, given there will be situations where a young applicant may be able to give good reason that they can sustain a tenancy as successfully as an older applicant.	H	+ and -
Disability	The Tenancy Strategy proposes that applicants with disabilities and/or special health needs should continue to be granted 'lifetime' secure tenancies. The document also makes reference to keeping disabled adapted housing in the lettings pool in the context of a succession scenario where the remaining housing occupants do not have a disabled housing need.	H	+
	The Tenancy Strategy highlights guidelines to Private Registered Providers on Affordable Rents which should be charged up to 80% of local market rents. In the event that new or re-let housing provided by Private Registered Providers which is adapted for wheelchair purposes, then this is likely to have negative impacts on this protected group. Research published by the Equality and	H	-

		Human Rights Commission in 2008 indicated that the median weekly earnings of disabled men is around 10% lower than that for non-disabled men. The research indicated that disabled women's income was 5% lower using the same research methodology. The level of rents charged by Private Registered Partners will vary according to rent policy for each organisation. Where the PRP concerned seeks to charge the maximum Affordable Rent, then disabled people requiring wheelchair accessible accommodation are likely to be disproportionately affected. The Council issues the large majority of tenancies to housing applicants (72% compared to 27% provided by housing associations with 1% placed outside the borough), therefore any proposal by PRPs to charge higher rents for properties that are adapted for disabled use will be proportionate to the housing supply available. The need for a specific approach to affordable rents for homes that are affordable to disabled people will be considered as part of the April 2013 Review.		
	Gender reassignment	The Tenancy Strategy is not expected to impact on people who have transitioned or are transitioning.	L	Neutral
	Marriage and Civil Partnership	The Tenancy Strategy is not expected to impact on people who are married or in a civil partnership.	L	Neutral
	Pregnancy and maternity	The Tenancy Strategy is not expected to have a major impact on this protected group. A small proportion of lone parents who are women (70 out of 164 homelessness acceptances in 2010/11) are likely to be impacted.	M	-
	Race	In the 'Age' section above, it is highlighted that 18-25 year olds will be granted 2 year fixed term tenancies in the first instance, which may lead to the granting of a longer 5 year tenancy at a later stage. 52% of council lettings in 2011/12 were to ethnic minority groups and therefore the granting of fixed term tenancies to future tenants is likely to have a relatively modest negative impact on people from race protected groups. Given that a proportion of lettings are made to young people in housing need, it is reasonably certain that a significant proportion of 2 year tenancies will be granted to applicants from ethnic minority backgrounds.	M	-
	Religion/belief (including non-belief)	The Tenancy Strategy is not expected to have negative impacts on people according to their religious beliefs.	L	Neutral

Sex	The Tenancy Strategy is not expected to have negative impacts on people according to their gender.	L	Neutral
Sexual Orientation	The Tenancy Strategy has not so far emerged as relevant to people's sexual orientation.	L	Neutral

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)?

No

The **Homelessness Strategy** sets out how the Council intends to meet its homelessness obligations (including preventative work) in the new operational environment. Core to the strategy is to continue its homelessness prevention approach which has been successful in reducing successful homelessness approaches since 2003/04 (see Homelessness Strategy Annex). This overall approach is intended to have positive impacts on the protected groups. The Housing Allocation Scheme which governs who qualifies for available accommodation gives greater priority to those who meet the reasonable preference and five year local connection criteria. Again, this is likely to have positive impacts on the protected groups. This will include seeking to discharge its homelessness duty into the private rented sector, subject to publication of the final CLG Homelessness (Suitability of Accommodation) (England) Order. Given that homelessness applicants who are accepted by the Council who are from one or more of the equality groups described below, these impacts will need to be monitored carefully. It should be noted that the final CLG Homelessness Order referenced above has yet to be published and therefore the Council's intention to discharge its homelessness duties into the private rented sector (PRS) cannot be fully implemented until the final Order is issued. The earlier referenced scoping work on the needs of the vulnerable, elderly and disabled is primarily relevant to the Housing Allocation Scheme but has links with the Tenancy Strategy and Homelessness Strategy. Taken with the Council's new statutory health role there is further work required to develop the Council's approach to the needs of the disabled, vulnerable and the elderly referenced in Section 7 of the Action Plan of this EqIA. This will be completed by HRD by April 2013.

In respect of both the Housing Allocation Scheme and the Homelessness Strategy, the Council intends to monitor and evaluate on a quarterly basis the impacts of its new policies.

Presently, the Council has 1,091 households who have been accepted as homeless (or a decision is pending) and are housed in temporary accommodation, both within the borough and outside. Over the past three financial

years the number and proportion of social housing lettings to homeless households has been as follows: 264 (27%) out 990 social housing lettings in 2009/10; 201 (22%) out of 911 social housing lettings in 2010/11; and 162 (25%) out of 646 social housing lettings in 2010/11.

The Council's power to discharge its homelessness duty into the private rented sector will be dependent on the publication of the CLG Homelessness Order. Whilst the Consultation document gives an indication of what the likely content will be, focusing on the suitability of location and quality of the accommodation, it is not possible to state what the Regulations will specify, and consequently what the equality impacts might be. The Regulations are expected to be published by December 2012 at the latest.

The earlier referenced scoping work on the needs of the vulnerable, elderly and disabled is primarily relevant to the Housing Allocation Scheme but has links with the Tenancy Strategy and Homelessness Strategy. This will need to take account of the Homelessness Order regulations. Taken with the Council's new statutory health role there is further work required to develop the Council's approach to the needs of the disabled, vulnerable and the elderly referenced in Section 7 of the Action Plan of this EqIA. This will be completed by HRD by April 2013.

Age	<p>The large proportion of homelessness acceptances (i.e., where the council has received an approach and has accepted a duty) by the Council are from people from younger age groups. Out of a total of 132 acceptances during Apr 2011 – Dec 2011, just 9 were from 60-64, 65-74, and 75 + groups. This is contrasted by a relatively high supply (c 100 p.a.) against demand for this kind of accommodation (c 300 p.a.) available from the Council where the older cohort of need can be reasonably confident of being re-housed. There is a clear trend of homelessness acceptances from people who are young; lone parents; from ethnic minorities; and, excluded from parents/relatives accommodation. There are a relatively small number of acceptances from people who have been in institutional care – just 2 cases in Apr 2011-Dec 2011 – which may be due to the developed approach that the Council has had to date with offering housing to young people leaving care. Given that it is likely that homelessness demand is likely to remain strong, it follows that its characteristics will remain similar also.</p> <p>Where the Council uses private rented housing to discharge its homelessness duties (subject to the above mentioned Homelessness order) then there are likely to be negative impacts on 18-24 year olds who comprised 26% of the successful homelessness approaches in 2010/11. Use of the private rented sector for discharging its homelessness duties is subject to publication of the</p>	<p>H</p> <p>M</p>	<p>+</p> <p>-</p>
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		Government's Homelessness Order.		
	Disability	The Homelessness Strategy identifies the importance of meeting housing needs of the disabled in line with the reasonable preference eligibility and qualifying criteria set out in both the Strategy itself and the Housing Allocation Scheme. The numbers of homelessness applicants approaching the Council on the basis of disability is statistically small and are therefore not monitored in a way that other cohorts of need are. This does not preclude applicants placing themselves in other cohorts of need, e.g., 'ex-institution of care'. The Council will need to monitor more closely this cohort of need (with relevant subsets to ensure there is appropriate demarcation of needs such as physical disabilities from learning disabilities).	H	+
	Gender reassignment	The Homelessness Strategy is not expected to have impacts on people who have transitioned or are transitioning.	L	Neutral
	Marriage and Civil Partnership	The Homelessness Strategy evidence base indicates that 12 homelessness cases (out of a total of 132) which involved violence related relationship breakdown were accepted during Apr 2011 – Dec 2011. This is proportionately more to the 20 cases accepted during 2010/11 (out of a total of 164 acceptances). It can be concluded that the council's homelessness approach will need to continue to make a meaningful contribution to meeting housing needs arising from domestic violence. The Homelessness Strategy and the Housing Allocation Scheme are clear in their support for victims of domestic violence, but such support will not automatically lead to an allocation of affordable rented housing.	M	+
	Pregnancy and maternity	The Draft Homelessness Strategy evidence base indicates that homelessness acceptances from female lone parents totalled 63 out of a total of 132 during Apr 2011 – Dec 2011. This compares with 70 out of 164 in 2010/11. This is a considerable proportion of total acceptances. Other evidence indicates that the large majority of homelessness acceptances during Apr 2011-Dec 2011 are from the 16-24 (38 acceptances) and 25-44 (65 acceptances) age groups, indicating that acceptance are from the younger age group cohorts with 31 acceptances to the remaining older groups.	H	+
	Race	The Homelessness Strategy evidence base has indicated that the majority of homeless acceptances since 2003/04 have been from ethnic minority groups. During April 2011-Dec 2011, the number from white groups totalled 51 with the	H	+

		<p>total number from non-white groups totalled 81. Given that people from ethnic minority backgrounds are disproportionately over-represented in deprivation indicators, this representation is to be expected in line with the statistics. In Section 3.28 of the Draft Housing Strategy evidence base, it is indicated that unemployment rates amongst black other, black Caribbean and black African groups were four times higher than that for white ethnic groups.</p> <p>Where the Council uses private rented housing to discharge its homelessness duties (subject to the above mentioned Homelessness order) then there are likely to be negative impacts on ethnic minority groups who comprised 60% of the successful homelessness approaches in 2010/11. Use of the private rented sector for discharging its homelessness duties is subject to publication of the Government's Homelessness Order.</p>	M	-
	Religion/belief (including non-belief)	The Homelessness Strategy is not expected to have impacts on people according to their religious beliefs.	L	Neutral
	Sex	The Homelessness Strategy evidence base indicates that 12 homelessness cases (out of a total of 132) which involved violence related relationship breakdown were accepted during Apr 2011 – Dec 2011. This is proportionately more to the 20 cases accepted during 2010/11 (out of a total of 164 acceptances). It can be concluded that the council's homelessness approach will need to continue to make a meaningful contribution to meeting housing needs arising from domestic violence. The Homelessness Strategy and the Housing Allocation Scheme are clear in their support for victims of domestic violence, but such support will not automatically lead to an allocation of affordable rented housing.	H	+
	Sexual Orientation	The Homelessness Strategy is not expected to have impacts on lesbian, gay, bisexual or heterosexual people.	L	Neutral
	<p>Human Rights and Children's Rights</p> <p>Will it affect Human Rights, as defined by the Human Rights Act 1998? No</p> <p>Will it affect Children's Rights, as defined by the UNCRC (1992)? No</p>			

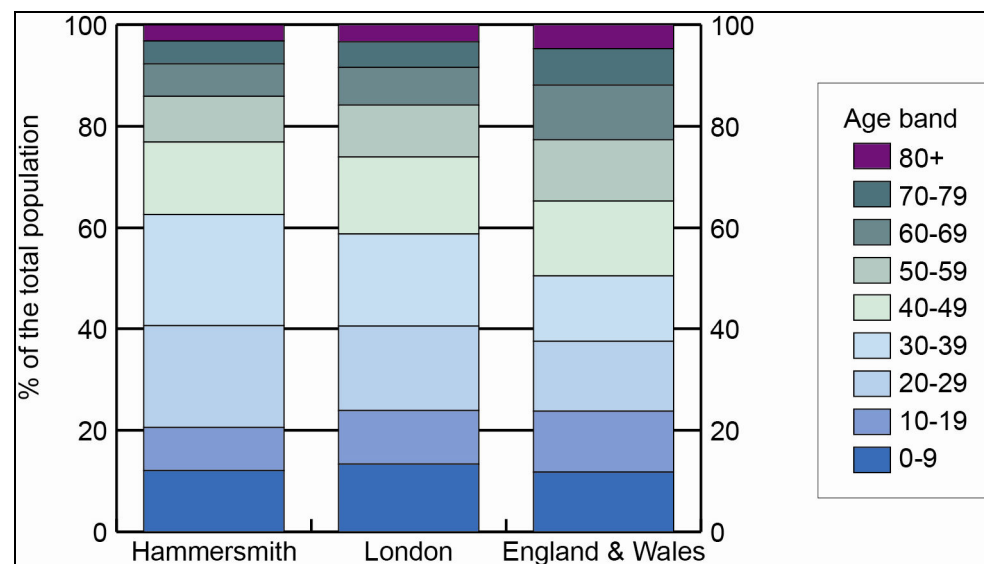
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Section 03	Analysis of relevant data and/or undertake research
Documents and data reviewed	<p><u>LOCAL DEMOGRAPHICS OF EQUALITY TARGET GROUPS</u></p> <p>A summary of the demographic situation in relation to each of the equality groups is given below. This provides a starting point for the analysis of likely impacts of the PDCS on these groups. Data based on the 2001 Census and will be updated when the 2011 Census data is complete enough to undertake a proper analysis.</p> <p>A summary of the current position in relation to each of the equality groups is given below. This provides a starting point for the analysis of likely impacts of the PDCS on these groups.</p> <p>Population</p> <p>The population of the borough is relatively young and ethnically diverse. It is also a highly mobile population with about half of all households having moved in the previous five years.</p> <p>It is projected by the GLA (2011), taking account of the borough's housing target of an additional 615 dwellings per annum, that the population will increase from 188,235 in 2011 to 208,683 in 2031 (an 11% increase).</p> <p>Households</p> <p>The borough has a high proportion of single people, the second highest proportion (54.7%) of any local authority in England & Wales and 43% of all households consist of one person households in 2008 (DCLG 2008).</p> <p>It is projected by DCLG (2008) that households will increase from 76,000 in 2011 to 82,300 in 2031 (an 8% increase). It is projected that the main growth in number of households will be in 'one person' households (21% up to 2033), while the number of 'co-habiting couples' households will decrease by nearly 11% between 2008 and 2033.</p> <p>Age</p> <p>In 2010, nearly half of the population (42%) is between 20 and 40 years old which is significantly higher than the London (35%) and the country (27%) averages (Source: ONS, 2010 mid-year estimates).</p>

Between 2010 and 2031, the population aged 20 to 49 is expected to grow by 6.5%, the population aged 50 to 64 by 37%, the population aged 65 to 79 by 15% and the population over 80 by 23%.

In 2010, the borough had a higher proportion of young adults aged 25-39 (34%) than London (28%) and England and Wales (35%). Conversely, the proportion of children and young adults (0-24) in the borough is lower than in London (29%) and England and Wales (31%). Finally, 23% of the population is aged 50 or over, which is slightly lower than the London (26%) and country (35%) averages.

According to the H&F Carer's Strategy 2005-2010 and Experian Mosaic Data for the borough, older residents in the borough are more likely to live alone.



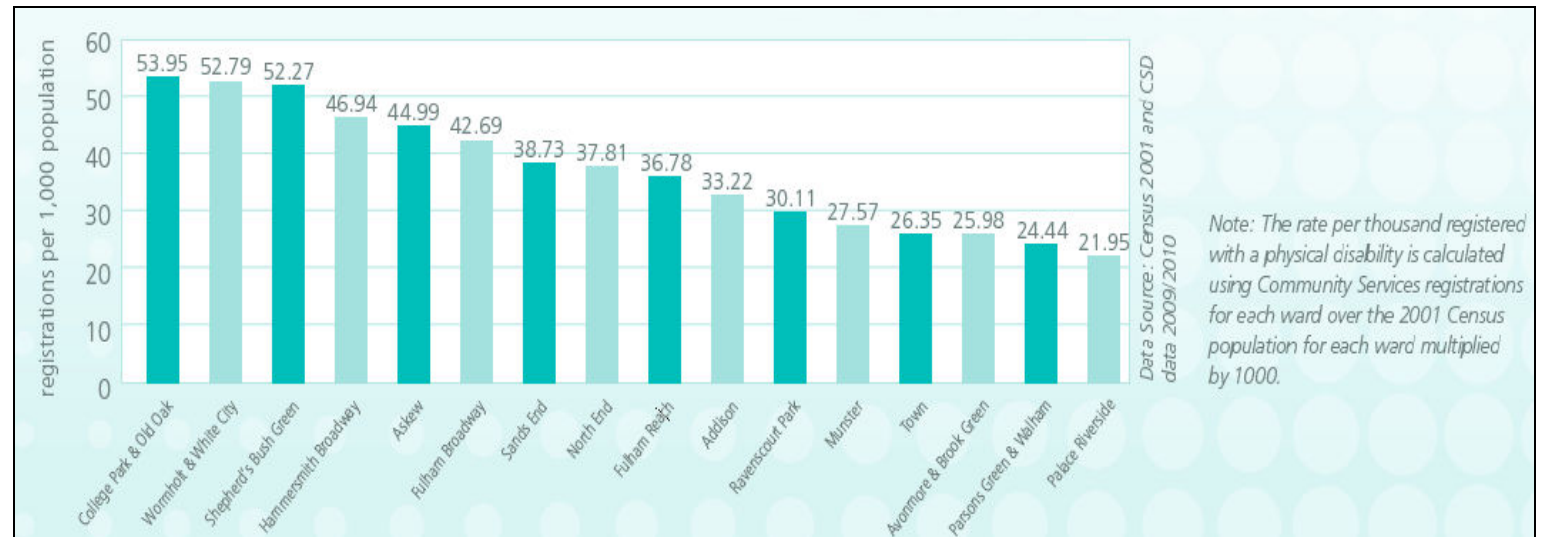
Age structure (% of total population – 2010) (ONS mid-year estimates)

Disability

The rate of physical disability registrations for Hammersmith and Fulham as a whole is 37.3 registrations per 1,000 population. The Single Equalities Scheme (SES) indicates that around 15% of residents in Hammersmith and Fulham have a disability. College Park and Old Oak has the highest rate of physical disability registrations in

the borough (53.95). The five wards with the highest rates are all in the north of the borough; College Park and Old Oak, Wormholt and White City, Shepherd's Bush Green, Hammersmith Broadway and Askew. Palace Riverside has the lowest rate of registrations in the borough. Physical disability registration is voluntary so the figures do not give a complete picture of disability within Hammersmith & Fulham.

We recognise that people with disabilities and those that support them may be represented in one or more of the other equality groups. The other related group that is usually referenced is age, in particular, we recognise that people with disabilities who can experience difficulty accessing services are often children and young people, older people, and those who may provide care for older and younger disabled people. As disability covers a broad spectrum, we also recognise that adaptations for people with mobility impairments may not make services accessible for people with sensory impairments, and that people with mental health or long-term limiting illnesses may have different requirements.



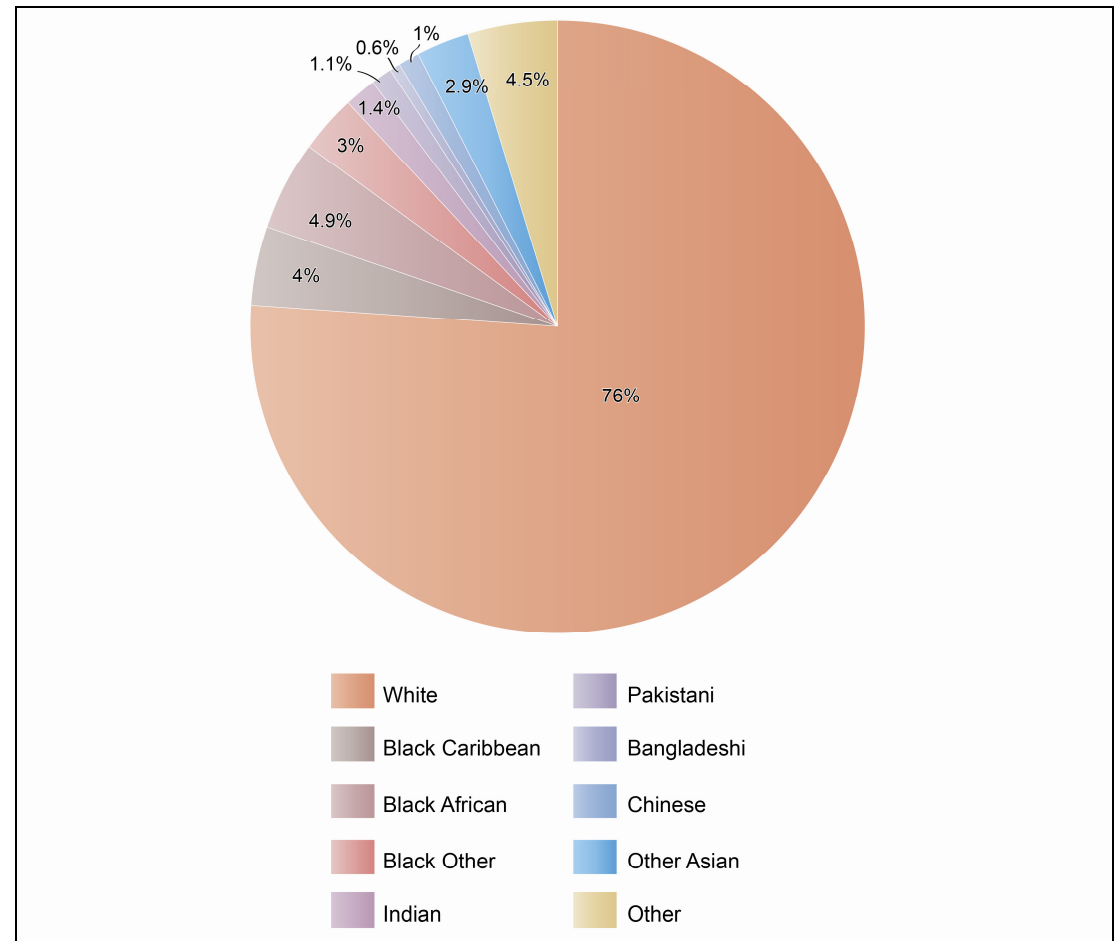
Number of people registered with a disability (Community Services registrations)

Race

According to the GLA 2010 round ethnic group population projections, 24% of the borough population in 2011

belonged to ethnic groups other than white. This represents an increase of 2% since 2001. The main ethnicity in the borough was 'white people' (76%) followed by people from 'black African' origin (4.90%) and the 'other'¹ group (see figure below).

In 2011, the white population represented 80% of the economically active population followed by the Black African ethnic group (4.4%) and the 'other group' (3.90%).



Ethnic groups in Hammersmith & Fulham (GLA 2010)

¹ The other group refers to the two ONS 2001 Census Ethnic Category: 'other mixed and Chinese or other.'

Religion

The religious profile of the Borough is less diverse than in London as a whole. In 2001, 63.6% of residents in the Borough were Christians, 6.8% were Muslim and 2.3% were other religions. This partly reflects the ethnic profile of the Borough, with a higher White population who are predominantly Christian and a lower Asian population who have a more diverse religious profile. In 2001, 17.6% of residents in the Borough stated that they had no religion. This is similar to the proportion for Inner London (18.3%) and Greater London (15.8%).

It is noted that members of this population will also be represented through one or more other equality strands and that race and religion are often linked, meaning that impacts may be experienced by this group in more subtle ways.

Sexual Orientation (and transgender)

The nature of issues facing LGB people is such that often, the voluntary sector has worked with those supporting transgendered or transitioning people as well, hence we often use the term LBGT (lesbian, gay, bisexual, transgender). This is relevant when assessing impacts and looking at populations, for there are no official statistics on sexual orientation or gender identity, as these are not routinely captured by public bodies, and are not captured by the census. However:

“In 2005, the Department for Trade and Industry published a figure of 6% as the percentage of LGBT people in the general population... the number of LGBT people in London is thought to be anywhere between 6% and 10% of the total population, increased by disproportionate levels of migration. This equates to an urban population of between 450,000 and 750,000”

(Kairos in Soho, *London's LGBT Voluntary Sector Infrastructure Project*, 25:2007)

To put this in a local context so far as is possible, although there are no accurate statistics for the numbers of lesbian, gay and bisexual residents in the borough, the 2001 census recorded 568 people (or 1.1% of couples), aged 16 and over, living as same sex couples in Hammersmith and Fulham. In 2009 there were 49 civil partnerships in this borough. This gives us some of the picture but within the parameters of the DTI figures, we note that these local statistics may hide single LGB people, or LGB people who have not entered into civil partnerships. We do not have specific data on transgendered or transitioning people.

It is noted that members of the LGBT population will also be represented through one or more other equality strands, meaning that impacts will be experienced by this group in more subtle ways.

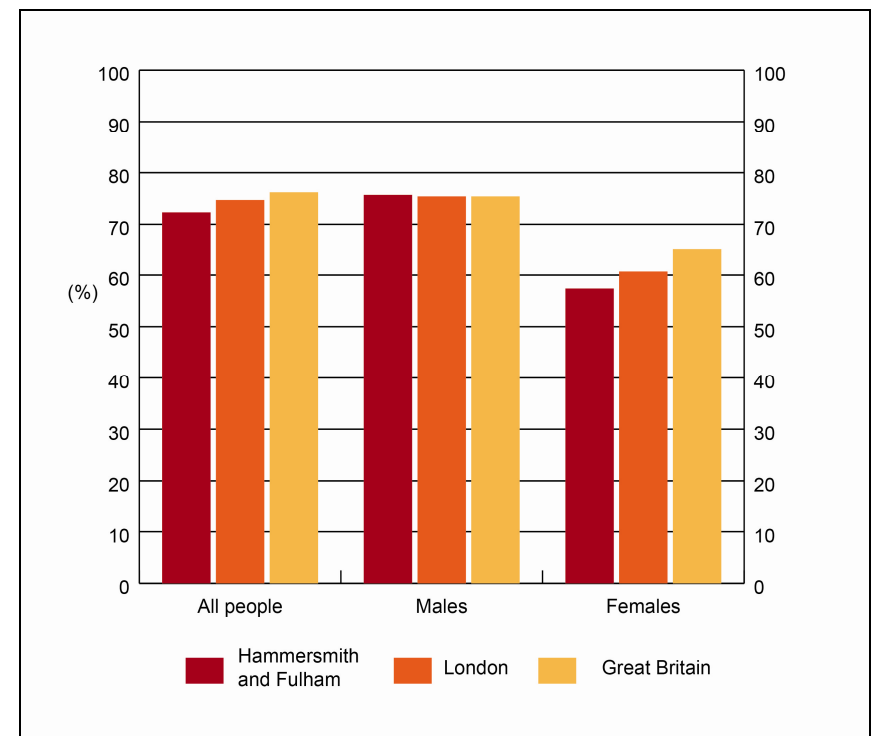
Gender and economic activity

In 2010, there are more men in the borough than women (there are more women than men in London).

The Single Equalities Scheme (SES) indicates that there are more female headed households in the borough which represents a key equality gap for Hammersmith and Fulham.

Women are less economically active than men representing respectively 62.8% and 81.4% in 2010. Those figures are lower than the London figures of 66.4% for women and 82.7% for men (Source: NOMIS).

Hammersmith & Fulham has a marginally higher proportion of male residents in employment (75.7%) than the London and national averages (75.4%), but has a lower proportion of female residents in employment (57.4%) than the London (60.7%) and national averages (65.2%).



Socio-economic

In 2010, Hammersmith & Fulham is ranked as the 55th most deprived local authority in England, in the country and there are significant pockets of deprivation.

The 2001 Census shows that Hammersmith & Fulham is a polarised borough with relatively high proportions of residents who are high earners and low earners. Census measures also show very high degrees of polarisation compared to other local authorities in educational attainment and occupation levels.

H&F has high proportions of working age residents in higher-paid jobs. In 2010, four in ten adults (39%) are managers, senior officials or professionals compared to 35.8% in London and 29.7% in the UK. 19.6% are in higher managerial or professional positions: this has increased significantly from 1991 when only 12.3% fell within this occupation group. There have been similar significant rises in associate professional and technical occupations: 15.8% in 1991, 23.5% in 2001 and 26.4 in 2010. On the other hand, 6.6% are in 'elementary occupations' compared to 8.6% in London and 11.1% in the UK.

In terms of economic inactivity, 27.7% of the 16-64 population in 2010 is inactive compared to an average of 25.8% in London.

References

1. LBHF Local Development Framework – Core Strategy (Oct 2011)
2. LBHF Local Development Framework – Proposed Development Management DPD (Nov 2011)
3. LBHF Strategic Housing Market Assessment (Dec 2010)
4. West London Strategic Housing Market Assessment (Nov 2010)
5. Hammersmith and Fulham Community Strategy 2007/14 (September 2007)
6. Mayor of London's London Plan (July 2011)
7. Mayor of London's Housing Strategy (Feb 2010)

8. LBHF Housing Strategy 2007/14 – A Housing Ladder of Opportunity for All (2007)
9. Mayor of London's A Revised London Housing Strategy (Dec 2011)
10. CLG A Fairer Future for Social Housing (Nov 2010)
12. LBHF LDF Strategic Housing Land Availability Assessment (Oct 2010)
13. LBHF LDF Background Paper: Affordable Housing (Oct 2010)
14. HMG Laying the Foundations: A Housing Strategy for England (Nov 2011)
15. TSA The Regulatory Framework for Social Housing in England from April 2012 (March 2012)
16. CLG National Planning Policy Framework (March 2012)
17. LBHF Housing Allocation Scheme (July 2009) Second Edition
18. LBHF Housing Demand by Applicant Type and Requirement (1 April 2012)
19. The CLG Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012 (July 2012)
20. CLG Allocation of accommodation: Guidance for Local Housing authorities in England (June 2012)
21. CLG Homelessness (Suitability of Accommodation) (England) Order 2012 – Consultation (May 2012)
22. CLG Pay to Stay Consultation Paper on charging higher rents to social housing tenants (June 2012).

New research	<p>Following the equality impact assessment review and feedback from interested parties, it has become apparent that further scoping work is required to better understand the housing needs and aspirations of vulnerable, elderly and disabled people (including people with learning disabilities), which will be undertaken before the Housing Allocation Scheme comes into force in April 2013, by way of a further report and recommendations which will be considered by the Executive Director for Housing and Regeneration in consultation with the Cabinet Member for Housing. the needs and aspirations of other protected groups are likely to feature as part of this process.</p> <p>There is some research and examples of good practice (cf the Homelessness Strategy), but in the context of significant strategic, policy and financial change and challenge at national, regional and local levels, a scoping review to assess how the needs of the identified groups can be met in the most effective way with the resources that will be available may be beneficial.</p> <p>The Council now has the advantage of the tri-borough working which means that the ability to share good practice is that much greater. Innovation and closer partnership working with the private sector and registered providers will potentially help greatly to improve what future services are on offer. In the context of diminishing resources available for public service delivery there is a clear need to understand clearly what the housing needs and aspirations of vulnerable, elderly and disabled and other applicants are and how future service provision can be calibrated efficiently and effectively.</p> <p>In tandem, the Council will shortly be taking on a statutory health and well-being role which creates some imperative to initiate this work in conjunction with health stakeholders. In that vein, the research work would need to be an action-oriented piece of work that focuses in simple terms what degree of need exists using existing research; what existing service delivery practice is undertaken; assess and evaluate possible positive and negative equality impacts; and establish how a more a holistic service delivery approach can be shaped in time for policy implementation in April 2013.</p>
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Section 04	Undertake and analyse consultation
Consultation	<p>The consultation process involved consultation with three core audiences:</p> <ul style="list-style-type: none"> • Council tenants and leaseholders representatives who were sent a letter from the Cabinet Member with the four strategy documents, annexes and draft equalities impact assessment. Other residents of the borough were able to contribute to the process through use of the Citizenspace consultation portal. The Council wrote to borough Tenants and Residents Associations; gave a presentation to the Tenants' Borough Forum on 22 May 2012; attended a stand at the Tenants' Conference on 14 July 2012; met with residents when requested;

- Council staff both within the Housing and Regeneration Directorate and wider staff membership, particularly staff responsible children and the elderly agendas as well as staff responsible for vulnerable adults such as people with dependency issues, victims of domestic violence
- Key agencies responsible for approving and/or delivering the Housing Strategy document, e.g., Mayor of London (who has to ensure that the local strategy is in broad compliance with his own regional document); private and affordable housing developers; providers of supported housing services; voluntary sector agencies; local advisory agencies.

In addition to the four draft documents, a housing strategy annex and draft initial screening equalities impact assessment was circulated either by post to some interested parties and available on the Council's Citizenspace consultation portal.

The Council convened two housing strategy meetings of the H&F Housing Association Forum on 18 May 2012 (before the official start of the consultation process) and 6 July 2012. One-to-one meetings were held with housing association and homelessness organisation representatives on housing strategy matters and specific issues of interest. A meeting was convened with the Mayor of London's housing representatives on 4 July 2012 (note of meeting attached as Annex E). The Council also wrote to local Members of Parliament; Assembly Member; and contacted elected Members by email. A meeting of the Housing, Health and Adult Social Care Select Committee discussed the housing strategy documents on 17 July 2012. The consultation process was also advertised on the Locata, the Council's choice based letting application and also on the Hammersmith & Fulham Voluntary Services website. The Council's own intranet was used to advertise the process to council officers. Letters were sent to national housing bodies – Chartered Institute of Housing, Shelter, Crisis, National Housing Federation – and also London Councils. The documents were also the subject of media attention in the national, regional and trade press.

The consultation period was initially publicised as being from 22 May 2012 to 18 July 2012, following approval by Cabinet of the documents on 21 May 2012. However, the process could not fully begin until after the 'call-in' period had expired. Letters and other email correspondence did not begin being sent out until after the call-in date of 30 May 2012. To compensate for this, the consultation deadline was extended 25 July 2012 to interested parties to ensure there was reasonable time for responses.

In total, there were a maximum of 114 respondents to the short online survey (see below). Some respondents did not answer certain questions, so responses varied according to question.

Using the Council's Citizenspace web-based consultation application, an eleven question online 'short' survey was prepared to cover key issues raised in each of the housing strategy documents. More detailed online surveys (which for consistency included the questions in the short survey) were created for each of the four documents. Set out below are summary comments on the key questions in the housing documents. The survey report is attached as Annex F to the Cabinet Report. The more in-depth survey will be available and will help inform the policies and procedures process detailed later on in this document.

What did online respondents say?

Focusing on the responses to the short online consultation survey, the responses ranged from strongly agree; agree; neither agree, nor disagree; disagree; strongly disagree. Where respondents neither agreed nor disagreed, their percentage response have been removed, hence the responses do not add up to 100%). On the issue of the three housing strategy themes (identified in section 2.1), there was support for the approach being adopted:

- **Deliver economic and housing growth** – 65% agreeing compared to 18% disagreeing
- **Tackle economic and social polarisation** – 55% agreeing compared to 20% disagreeing
- **Manage a better, streamlined service** – 59% agreeing compared to 22% disagreeing
- On the housing allocation scheme, there was strong agreement – 80% - for the council's proposals to **verify needs at the point of application**, compared to 13% who disagreed. On stopping applicants from outside the borough applying for housing in Hammersmith & Fulham, there was strong agreement – 66% - compared to 24% disagreeing. There was strong support – 54% - for the Council's intention to modify its approach to the choice based lettings scheme compared to 32% disagreeing.
- On the issue of introducing a **five year local connection rule**, 47% of respondents thought the length 'about right' with 21% thinking it too short, and 32% thinking it too long.
- On the issue of **tenancy succession**, 47% agreed with the approach being adopted with 41% disagreeing.
- Just under half of respondents (47%) thought that the **guideline maximum household income of £40,200 for accessing social housing** was about right, with 37% thinking it too low and 19% thinking it too high.
- On the Council's intention to **give greater housing allocation priority to groups who make a community contribution**, there was strong support with 61% agreeing compared to 27% disagreeing.

- On priority for particular community groups, the strongest support was for **working households** – 78% - with the lowest support for young people (52%), applicants in training and employment (50%) and volunteers (50%).
- On the Council's intention to issue **five year fixed term tenancies**, 48% agreed compared to 39% who disagreed. In respect of using two year tenancies for those who had a history of anti-social behaviour, committed a crime, etc, 68% agreed compared to 24% disagreeing. And for issuing 2 year tenancies that were between the ages of 18 and 25 years old, 53% agreed compared to 31% who disagreed.
- On homelessness issues, there was **strong support for the Council's intention to end the perception that a homelessness application will lead to a social housing tenancy**, with 53% agreeing compared to 24% disagreeing. On using private sector rented housing outside the borough to meet its homelessness duties, 47% agreed compared to 33%.

What did written respondents say?

A number of respondents preferred to submit their responses in writing rather than use the online mechanism. This was particularly relevant where respondents had convened their own meetings and wished to present their views in the form of meeting minutes or written responses. And some specialist organisations, e.g., from the homelessness and learning disabilities sectors had issues of detail which did not necessarily lend themselves to a survey response. Also received was a response from the Member of Parliament for Hammersmith. The responses from individual groups are summarised in Annex G of the Cabinet report, and will be published in full, subject to permission from respondents. Some respondents saw the changes proposed as an opportunity to stop perceived shortcomings in current policy and practice. Many interested parties across the spectrum saw the changes as a fresh opportunity to engage with the borough on housing issues.

In summary, for **Housing Strategy** interest groups representing people who are physically disabled, learning disabled, and elderly were concerned that their needs were not sufficiently identified and consequently would not be prioritised under the new strategic approach. There was also a broader concern that existing development planning policies designed to meet these groups' needs were not delivering on the ground, despite sound policies being in place. Delivery of housing that is wheelchair accessible and meeting lifetime homes standards were quoted as concerns. Housing Associations (described as Private Registered Providers in the strategy documents) were concerned that their potential role in helping delivering the strategy objectives, which they were broadly

supportive of, was not being given sufficient profile, given that they collectively own and manage as much affordable housing as the Council. In a similar vein, some housing associations considered the strategy to be 'council-centric' and not sufficiently partnership focused.

On the **Housing Allocation Scheme**, there were concerns from housing associations that the move towards more direct lettings reduces the element of choice for applicants and may in practice be more time-consuming to operate. There was a general concern from disabilities organisations that the housing needs of their client groups might be marginalised. There were additional concerns about how the community contribution mechanism might work in practice for people who may not be able to spend time volunteering or access sustainable employment. Concern was also expressed about how the Accessible Housing Register (which is to be retained) will work with the new Assisted Choice approach, replacing the current Choice Based Letting scheme. Homelessness organisations expressed concern that their client groups needs may be marginalised, although there was some 'in principle' support for the overall strategic approach. Concerns were expressed about how ex-offenders and the fairness of the proposal for 2 year tenancies for this and other client groups, such as 18-25 year olds. There was a broader issue of how the new Scheme could reduce 'silting up' of supported housing, where vulnerable households were reluctant to 'move on' to other permanent accommodation. However, a number of respondents were broadly supportive of the additional priority being given to community contribution groups, e.g, working households, ex-armed services personnel, and also recognised that the current choice based lettings scheme was not flexible enough to meet disabled people's needs.

On the **Tenancy Strategy**, housing associations (described as Private Registered Providers in the strategy documents) were clear that they would have regard to the strategy on fixed term tenancy matters. However, they were generally reluctant to change their approach based on the Council's adopted position. Whilst many are issuing fixed term tenancies (and have been able to for some time), they are generally of the view that differing local authority positions on fixed term tenancies make it difficult for them to adopt a single position. An issue of contention was also the fairness of granting 2 year fixed term tenancies for 18-25 year olds and to a lesser degree, people who had history of anti social behaviour, tenancy fraud, etc.

On the **Homelessness Strategy**, the general concern was about how sustainable an option the private rented sector would be to meet homeless people's needs, whether within the borough or outside it. The potential break up of friend and family networks was also highlighted. This change would need to be monitored to assess its impacts. There was also a concern that the needs of rough sleepers weren't sufficiently profiled.

Mayor of London's Housing Strategy

A key consideration for the Council was to ensure that the documents were in general conformity with the Mayor's Housing Strategy, the latest iteration of which is the Revised Housing Strategy (December 2011). The final Housing Strategy is not expected to be published until April 2013 but is not expected to depart substantially from the policy content set out in the 'revised' document. Representatives from the Mayor's Housing Team attended a meeting with the Council on the 4th July 2012 to discuss any changes that the Mayor may seek to the Council's four draft documents to address conformity issues. There were some issues raised (see Annex E attached to the Cabinet report) which the Council considers to be satisfactorily addressed in the revised documents.

CLG Regulations, Guidance and Consultation Papers

Since the 23 April 2012 Cabinet meeting, a number of Government Community and Local Government (CLG) documents have been published which have influenced the content of some of the housing strategy documents.

- The CLG Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012 (July 2012)
- Allocation of accommodation: Guidance for Local Housing authorities in England (June 2012)
- The CLG Homelessness (Suitability of Accommodation) (England) Order 2012 – Consultation set out the Government's proposals for defining the suitability – quality and location - of private rented housing for homeless people (May 2012)
- The CLG Pay to Stay Consultation Paper on charging higher rents to social housing tenants (June 2012).

The Council has had regard to the first two of these documents when preparing the housing strategy documents (principally the Housing Allocation Scheme in these instances) and made reference to the likely direction of travel that may follow the adoption of policy on the second two documents.

Analysis

Following the consultation process, the Council has identified five key areas that require further and ongoing attention. A recurring theme of this equalities impact process has been the need to put in place robust monitoring and evaluation mechanisms once the Housing Allocation Scheme 'goes live' in April 2013. Five key areas of analysis were identified:

1. On adoption of the four strategy documents, the Council will need to develop a set of policy and procedure notes that will set out how the new Housing Allocation Scheme will operate. Accompanying this will need to be a

more detailed approach to monitoring, reflecting the needs of equality groups identified in this Impact Assessment, but also subsets that cover specific needs, e.g., demarcating physical disabilities from learning disabilities. In tandem, the Council will need to continue maintaining the Accessible Housing Register, ensuring that it has close interface with the day to day process of matching suitable accommodation to applicants needs.

2. The equality impacts of granting 2 year fixed term tenancies for 18-25 year olds (and other groups) needs to be carefully monitored and evaluated.

3. The need to scope out how a more developed approach to meeting the needs of the vulnerable, elderly and disabled might be achieved. Whilst there is evidence that such housing need both exists and is growing and that housing supply (e.g., through sheltered housing for older people which provides over 100 homes annually for older applicants) is available, there is a clear need to deliver a more integrated approach that reflects the overlapping needs that these three cohorts of need have. In addition, the Council needs to have new regard to its new statutory health and well-being role which require closer alignment between its housing and health strategic service delivery functions.

4. The Council will need to monitor the equality impacts of using private rented housing to discharge its homelessness duty. It is clear from data set out in the Homelessness Strategy annex that a significant quantum of homelessness demand comes from people who are in one or more of the equality groups who may also have additional health needs. There are specific issues that have to be taken into account regarding the statutory rights and needs of children, particularly in respect of reasonably close access to schools, health facilities and other services that the council may be providing such as monitoring children at risk.

5. The Council proposes to use Local Lettings Plans to help deliver the broad objective of mixed, balanced sustainable communities, using applicants from the Home Buy Register who may wish to access a short term affordable rented option. Clearly there will be an 'opportunity cost' to this approach as some nominations may be made to applicants who may not have 'reasonable preference' under the Housing Allocation Scheme, but do meet Home Buy Register criteria. Equality impacts will need to be monitored and evaluated.

Section 05	Analysis of impact and outcomes
Analysis	At present there is no evidence that that any lawful or unlawful discrimination will take place. Where the Council intends to use private rented sector accommodation to discharge its homelessness duty, this can only be done in line with the CLG Homelessness Order Regulations when published.

	<p>Following the analysis sequence in the above section:</p> <ol style="list-style-type: none"> 1. Develop a set of procedure notes to deliver the new approach set out in the Housing Allocation Scheme including monitoring and evaluation criteria to assess equality impacts. 2. The Council needs to be mindful of potential negative impacts of granting 2 year fixed term tenancies to 18-25 year olds (and other groups granted such tenancies). At this early point it is not possible to assess the range of positive and negative impacts that will occur. The Council is one of a small number of local authorities that is taking advantage of the housing related freedoms and flexibilities that have been granted under the 2011 Localism Act and there is not evidence that can be drawn from other local housing authorities. 3. Undertake an initial scoping exercise to review how the housing needs of the vulnerable, elderly and disabled are being met and assess how they will be met under the new housing allocation scheme. There is evidence available and good practice already in place (such as the existing close working relationship with supported housing providers), but given the scale and scope of changes proposed under the new Housing Allocation Scheme this is a timely opportunity to review how this impacts on the groups identified above, and how their future needs and aspirations might be met within the financial constraints that the Council will be operating. The scoping exercise may require further desk-top research and engagement with groups representing disabled people interests. 4. Monitor and evaluate the equality impacts of using private sector housing to discharge the Council's homelessness duty. Until the CLG Homelessness Order is in place, the Council will not be able to implement this proposal. 5. Monitor and evaluate equality impacts of Local Lettings Plans where nominations are proposed to applicants on the Home Buy Register who do not meet the reasonable preference criteria.
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Section 06	Reducing any adverse impacts
Outcome of Analysis	<p>A recurring outcome of the analysis of each of the documents is the need to have in place robust monitoring and evaluation mechanisms to monitor what impacts might occur following the implementation of the strategy documents' proposals. The impacts to be monitored are primarily oriented towards the Housing Allocation Scheme and the Homelessness Strategy, although there are obvious links to elements of the Tenancy Strategy (in respect of the 2 year fixed term tenancies) and the Housing Strategy (in respect of delivering wheelchair</p>

accessible housing and the 16 lifetime homes standards). A comprehensive approach will need to be developed which must have regard to what impacts – negative and positive – are being experienced already. There will need to be some review of the fairness of existing policies and procedures and whether negative impacts on one equality group can be mitigated by a positive impact for another equality group as described in the housing allocation scheme section on gender and race.

Reference has been made to addressing the housing needs of vulnerable, elderly and disabled people and other protected groups in a more strategic fashion. This will happen by no later than March 2013, in time for the implementation of the Housing Allocation Scheme (and any other relevant policy changes arising from adoption of the other strategy documents) and all policies in April 2013.

Section 07		Action Plan					
Action Plan		Issue identified	Action (s) to be taken	When	Lead officer	Expected outcome	Date added to business/service plan
		Ensure policy and procedure notes include fit for purpose equalities and evaluation mechanism	Drafting of Policy and Procedure Notes including equalities and evaluation monitoring mechanism	Oct 2012 – Dec 2012.	Aaron Cahill	Policy & Procedure Notes including monitoring and evaluation mechanism	28 September 2012
		Requirement to monitor and evaluate equality impacts of granting 2 year fixed term tenancies for 18-25 year olds	Monitoring and evaluation of tenancies granted to 18-25 year olds to assess positive and negative impacts on specific equality groups	April 2013 – March 2014 (Report in June 2014)	Mike England	Evaluation Report	28 September 2012
		Scoping exercise	Review existing	Apr 2013	Aaron Cahill /	Scoping Report	28 September

	to assess the housing needs and aspirations of vulnerable, elderly and disabled (including people with learning disabilities) groups and develop an approach to effectively address identified needs. Other groups may be identified as part of this process.	housing needs exists; review existing service delivery practice; assess and evaluate possible positive and negative equality impacts; establish how a more a holistic service delivery approach can be shaped; develop an implementation plan		Mike England		2012
	Requirement to monitor and evaluate equality impacts discharging homelessness duty into the private rented sector	Monitor and evaluate equality impacts of homeless households who are allocated private rented accommodation	April 2013 – March 2014 (Report in June 2014)	Mike England	Evaluation Report	28 September 2012
	Monitor and evaluate equality impacts of adopting Local Lettings Plans	Monitor and evaluate	April 2013- March 2016 (with interim annual reports in April 2014 and April 2015).	Mike England	Evaluation Report	28 September 2012

Section 08	Agreement, publication and monitoring
Chief Officer sign-off	Name: Mel Barrett Position: Executive Director Housing and Regeneration Email: Melbourne.barrett@lbhf.gov.uk Telephone No: 0208 753 4228
Key Decision Report	Date of report to Cabinet Member: 15 October 2012 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: 28/09/2012 Email: PEIA@lbhf.gov.uk Telephone No: 020 8753 3430