

LBHF Equality Impact Analysis Tool

Overall Information	Details of DRAFT Equality Impact Analysis
Financial Year and Quarter	2014/15 quarter 3
Name and details of policy, strategy, function, project, activity, or programme	<p>Delivering the Change We Need in Housing</p> <p>Short summary: The purpose of ‘Delivering the Change We Need in Housing’ is to review and update the Housing Strategy 2012 and associated documents as a result of the administration change in May 2014. There are additional housing strategy annexes which include references and evidence to support the housing strategy, these include an ‘Older and Vulnerable People’s Approach’ which sets out the Council’s approach to working with older people and people with additional support needs. The Housing Strategy sets the overall ‘direction of travel’ and the development and regeneration objectives of the Housing Strategy reflect the council’s local planning objectives. Consultation will follow on the detail of proposed changes to the associated documents referenced below.</p>
Date of completion of final EIA	22 December 2015

Section 02	Scoping of Full EIA
Plan for completion	<p>Timing: Consultation on Housing Strategy will begin in early January 2015 and will close on 27 February 2015. Following this there will be a consideration of the responses with Cabinet approval of a revised strategy planned for May 2015.</p> <p>Resources: The consultation process will be led by the Interim Housing Strategy Manager.</p>
Analyse the impact of the policy, strategy, function, project, activity, or programme	<p>The Council is seeking to achieve a number of objectives through its revised housing strategy. The overall intention is to increase the range and number of housing choices that applicants are able to make, both for working and non-working households. This will be through a process of re-stating existing policy and additional refinements to better reflect the new administration’s priorities. These priorities are to give council tenants local control over their homes, provide new opportunities for secure tenants and to improve private rented housing.</p>

Within these priorities the Council wishes to: strengthen criteria for affordable housing, work with reputable Registered Providers and developers to provide more rental and low cost home ownership housing, maximise use of Borough's landholdings for new affordable housing, adopt planning policies to encourage the delivery of more larger homes to alleviate overcrowding, explore new affordable housing models and reduce long term empty homes and prosecuting rogue landlords.

The Council has prepared and is consulting on one document and annexes that will constitute the revised housing strategy and these documents reflect a change in line with the above policy priorities. The **Housing Strategy** sets out the overall 'direction of travel' for the administration's housing approach and highlights the approach to deliver the new administration's housing objectives.

It should be noted that the existing **Homelessness Strategy** which forms part of the 2012 Housing strategy will be replaced by a Homelessness Prevention Action Plan which will be developed by a cross sector working group delivering the administration's commitment to work more closely with the third sector on homelessness and homelessness prevention.

The Council's HomeBuy Allocation Scheme will be updated to reflect the emphasis on affordability and increasing the range of products available and there will also be an associated review of the current priority list.

The Housing Strategy will be subject to a consultation process from interested parties in Hammersmith and Fulham and other parties such as the Mayor of London.

Initial assessments indicate the proposed changes contained within the revised housing strategy documents should have an initial positive impact across a number of equality groups. However any impacts will need to be monitored on an ongoing basis to assess whether there are any unintentional consequences resulting from policy changes and to allow any negative impacts to be 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 EIA reviews the equality impacts of the revised Housing Strategy and its annexes. Where applicable specific EIA assessments will be carried out on the potential impacts of any specific projects that may arise from the revised strategy.

The **revised Housing Strategy** sets out the overall direction of travel for the new administration's housing approach and includes a number of proposed policy changes and changes in emphasis and these are reflected across three themes with actions for delivery identified within an attached action plan. The three revised housing strategy themes are:

- Regenerating Places and Increasing Affordable Housing Supply

- Meeting Housing Need and Aspiration
- Excellent Housing Services for All

Each of these themes includes a number of policy changes which are summarised below under the theme headings and for the purposes of this EIA it is the impact of these changes which are analysed.

Regenerating Places and Increasing Affordable Housing Supply

The Council is considering options for empowering residents to take control over their homes and for maximising investment in existing and new council homes. There is a greater emphasis on social and family housing, increasing availability and choice of affordable housing and a commitment to working more closely with Registered Providers including seeking innovative models of affordable housing.

Meeting Housing Need and Aspiration

The Council will review options for amending the existing housing allocation scheme and creating new forms of tenancies, work more closely with the third sector to develop a Homelessness Prevention Action Plan, seek to increase range of HomeBuy products and an emphasis on better meeting the needs of older and vulnerable groups including disabled and learning disabled people. The Council is committed to working in partnership across agencies to deliver its responsibilities under the Care Act 2014 and to ensure that the most vulnerable in society have access to suitable housing options and where necessary can live in a supported housing environment. The Council has stated its preference for secure 'lifetime' tenancies which are affordable to local people.

Excellent Housing Services for All

The Council will work with residents to develop greater levels of tenant participation and engagement to help deliver improved housing management services and will focus on tackling empty properties and improving the quality of private sector. We aim to work closely with all agencies to deliver safer places for people to live in.

It should be noted that following a Court of Appeal Judgement (Jakimaviciute -v- London Borough of Hammersmith and Fulham Nov 14) LBHF will be initiating a policy change to the Housing Allocation Scheme which will lead to re-instating households in long term temporary accommodation back onto the housing register.

Protected characteristic	Analysis	Impact: Positive, Negative, Neutral
Age	<p><u>Older people:</u> The new administration recognises the huge regeneration opportunity that the Council’s land and holdings present and wants current and future residents to be central to their approach. The Council is setting up a Resident’s Commission on Council Housing to consider the options for empowering residents to take control of their own homes and for maximising investment in existing and new council homes and the commission will take into account sheltered housing. The Council’s 2011 Core Strategy Housing Policy H4 currently states that housing for people who need care and support must be protected and subject to continuing need, applications, where there is an established local need, will be supported.</p> <p>Population estimates indicate a 40% increase in the over 65 population over the next 20 years with the sharpest increase in the over 85 population. The number of older people who cannot carry out one routine mobility activity of daily living is estimated to increase by over 19% by 2020 with an over 5% of older people using a wheelchair or mobility aid. (Source – LBHF Draft SHMA 2014). There will be challenges in meeting changing needs and promoting independence within the bulk of existing stock. Whilst the provision of older peoples housing is relatively high much of the sheltered housing stock is not well suited to those with higher level care needs as a number do not have lift access and cannot accommodate wheelchair access or parking of motility scooters and demand levels for sheltered housing are relatively low. The majority of older people in social housing live in general needs housing and the bulk of the council’s general needs housing stock is flats with nearly half having no ground floor entrance and some having no lifts. Options for those in the private rented sector and owner occupiers are limited with very few downsizing specialist options available.</p> <p>The delivery of around 25,800 new homes in the period 2015 – 35 means there will be a 10% increase of wheelchair accessible and Lifetime Standard Homes across tenures increasing the availability and meeting the needs of a changing population. As well as this the delivery of additional extra care provision within the White City regeneration scheme will expand the range of options available</p>	<p>Positive</p> <p>Positive</p>

	<p>for older people. Estimation on demand for services for older people is complex but the current indication is that the upward trend is set to continue and it is therefore reasonable to assume that this is likely to translate into an increase in demand for older peoples care and accommodation.</p>	
	<p>There are 214 people aged 60 and over on the housing register and of those the majority will be eligible for and interested in sheltered housing. 35% of existing council tenants are aged over 60 of which over 20% live in sheltered accommodation. In 2013/14 just over 16% of housing allocations were into sheltered accommodation. 35% of all council tenants are aged 60 and over and the tenancies awarded for this age group has always been secure lifetime tenancies.</p>	Neutral
	<p>Alongside the Residents Commission on Council Housing there is a planned review of options for sheltered housing which will be carried out in partnership with Adult Social Care and Health and this offers an opportunity to pick up on the tri-borough JSNA on older people and housing to consider how best to meet changing population needs of existing and future tenants and explore how the Council's offer for older people could be improved in light of responsibilities under the Care Act 2014.</p>	Positive
	<p>Over 1/3 of applicants aged 60 and over, requiring adapted property, require 2 bed and over therefore any increase in the supply of larger affordable rented social housing will benefit this group. Conversely the remaining two thirds on the register requiring 1 bed only will be benefitted by increased availability of general needs housing due to the halting of vacant stock disposal</p>	Positive
	<p>Improvements in housing management and community safety will have a beneficial impact on this protected group.</p> <p><u>Young people</u> The profile of the borough is relatively young with 26% of the population aged 25 – 34. 12% of applicants on the housing register and 14% of households in temporary accommodation are aged 24 years and under and 22% of HomeBuy applicants are aged 30 and under. Close to a third of residents under 24 require 1 bed property therefore the council's policy to halt disposal of stock should positively impact this group through increased availability of properties. Any</p>	Positive

		<p>increase in availability of affordable rented provision and maximisation of existing stock will be beneficial to this group as the impact of high rents and lack of affordability of housing for young people have been well documented in London.</p> <p>13% of those currently in temporary accommodation are aged 25 and under therefore this group will be positively impacted by the council requalifying those who are owed the homeless duty who are in suitable long term accommodation. However the long term impact of this policy change will need to be fully monitored to examine the impact on waiting times and how this affects protected groups.</p> <p>The new administration has made a commitment to take measures to support homeless children and ensure that homeless young people and care leavers have safe accommodation and access to mentors. This will be taken forward in partnership with the third sector and will have a positive impact on vulnerable young people. A relaxation on the needs threshold on overcrowding will have a positive impact on families and the children within the households positively affected by this change.</p> <p>Increased availability of affordable rented properties and innovative HomeBuy products targeted at young renters will have a positive impact on the younger population within the borough as would any decision to re-instate 'lifetime tenancies' across all new tenancies .</p> <p>33.3% of the borough tenure is comprised of private rented tenancies but the data on these households is limited however any focus on improving this sector and tackling empty properties will benefit younger residents who are more likely to live in the private rented sector.</p>	<p>Positive</p> <p>Positive</p> <p>Positive</p> <p>Positive</p>
	Disability	Information on existing tenants and physical disabilities does not provide an accurate picture of the tenant profile as information is captured at the point of tenancy signing but there isn't a systematic approach to keeping tenant information updated and information of those on the register gives only a partial	

		<p>pictures as it reflects demand only. Current figures for physical disability show 6.6% of those on the housing register are adults with a physical disability and 3.5% of all existing tenants report a physical disability. However three quarters of the Council's housing stock is flats with nearly half having no ground floor entrance and some having no lift access. The borough's accessible housing register shows a limited supply of step free, accessible housing. Given that over a third of council tenants are aged 60 and over it can also be assumed that a number of these residents will develop physical disability or mobility problems.</p>	
		<p>70% of all disability claimants in LBHF are of working age which is higher than the London average and 24% of all claimants are receiving the higher care rate. It has been noted that in general disabled residents are proportionately less likely to be in employment and where they are earning levels may be low. The employment rate for those living with health conditions lasting 12 months or more is 60.1%. Within this figure those with learning disabilities and mental health needs have significantly lower employment levels at 33.1% (Source Disability Benefits Claimants – Borough Overview LBHF March 2012 and LBHF Draft SHMA 2014)</p>	
		<p>The delivery of around 25,800 new homes in the period 2015 - 35 means there will be a 10% increase of wheelchair accessible and Lifetime Standard Homes across tenures increasing the availability of suitable accommodation and delivering a better stock of accommodation to meet disabled people's needs. There are a number of new developments in the current pipeline which will deliver additional extra care and specialist provision for those with disabilities As well as this the new emphasis on affordable rent levels and range of products available in the social housing sector should have a positive impact on disabled residents as affordability of rent is a key issue for this protected group.</p>	Positive
		<p>The Council plans to review and remodel existing supported housing for people with learning disabilities to better meet existing and future needs and address problems in existing provision. This will allow the council to improve the commissioning and delivery of support services and will have a positive impact for this protected group.</p>	Positive
<p>The proposal for a relaxation of the needs threshold for applicants with medical conditions would mean that applicants who have a medical conditions, that is</p>	Positive and negative		

		<p>moderately impacted by current housing circumstances, could be eligible for re-qualification for the housing register . In total 99 households were disqualified from the housing register for this reason of whom 38 also failed the residence test. Whilst this would have an initial positive impact on those with less severe medical need the impact on overall waiting times will need to be monitored and the impact on those with greatest need will be monitored.</p> <p>The Residents Commission on Council Housing will consider options for empowering residents to take control of their homes and maximise investment in existing and new council homes. This will provide an opportunity to give further consideration to the meeting the current and future needs of disabled residents.</p> <p>Any improvements to personal and community safety across estates will have a positive impact on disabled residents as the borough's last two annual residents surveys of people with disabilities reported that people with disabilities felt less safe outside both in the day and at night compared with people without disabilities.</p>	<p>Positive</p> <p>Positive</p>
	Gender reassignment	The revised Housing Strategy is not expected to have a negative or positive impact on people who have transitioned or are transgender	Neutral
	Marriage and Civil Partnership	The revised Housing Strategy is not seeking to deliver a specific service for married people or people who are civil partners.	Neutral
	Pregnancy and maternity	<p>The Council's revised Housing Strategy has placed a greater emphasis on social and family housing . The affordable housing statement indicates a target of at least 40% of all additional dwellings built between 2015 – 25 should be affordable with 60% of additional affordable housing should be for social or affordable renting and 40% affordable housing for low cost ownership. Within the affordable housing for rent there is a greater emphasis on provision of larger family units.</p> <p>The increased availability of family homes is likely to have a positive impact on this protected group. In 2013/14 just over 95 of all duty acceptances were pregnant women or pregnant women with dependent children but this group formed less than 1% of allocations. The majority of pregnant women or pregnant women with dependent children on the housing register have a 2 bed and above</p>	Positive

		<p>requirement and any relaxation to the needs threshold on overcrowding to allow families overcrowded by one 1 bedroom to qualify will have a positive impact on this protected group. However the limited supply of larger 3+ bed accommodation may disproportionately impact pregnant women with dependent children and the impact of changes to the allocation policies will need to be monitored. Only 18% of 2013/14 allocations across all groups were for properties of 3 beds and above reflecting the limited supply in the borough and of those only 2 went to pregnant households.</p> <p>Any change to the housing allocations scheme to re-instate homeless families where duty is accepted back on the register will have a positive impact for pregnant women as will relaxation on medical needs and overcrowding. This protected group would also benefit from the proposal to award all new tenants lifetime secure tenancies. As with other protected groups the long term impact of changes will need to be monitored in order to assess the impact on waiting times and how this effects protected groups</p> <p>Given that around a third of Hammersmith and Fulham residents live in private rented accommodation it is likely that improvements in this sector will have a positive impact on this protected group.</p>	Positive
	Race	<p>2011 census figures found 55% of the population of Hammersmith and Fulham are from a population group other than White British and of these 31.9% of residents belong to an ethnic group other than White. The main ethnic minorities identifies in the borough are Black African (5.8%), Mixed (5.5%). 40% of all council tenants identify themselves as from Black and Minority Ethnic groups and the majority of these tenants live on Council Estates. 74.2% of the working age population are from white ethnic backgrounds compared to 59.4% for those from BME backgrounds with varying employment rates between ethnic groups. (Source: Annual Population Survey 12 months to June 2013). The high levels of deprivation that continues to be experienced by some ethnic minority households translates into an inevitable high level of representation with homeless and housing demand figures.</p> <p>In 2013/14 around 44% of homeless acceptances were from white or white other groups and acceptances from BME groups formed the majority of acceptances during this period. 60% of those in temporary accommodation are from BME or</p>	Positive

		<p>mixed backgrounds. The housing register currently constitutes 36.43% from White UK and Irish, 8.12% from Other White, 6.03% not stated, Other Ethnic – 5.68%, Mixed 4.99% and Black and Black British and Asian and Asian British 38.75%. Any changes to the housing allocation scheme in relation to reinstating homeless families on the housing register, relaxation of overcrowding requirement or medical needs threshold should have a positive impact on all race groups but the impact will be proportionately higher in BME in line with their presence in homelessness statistics as will a decision to award secure lifetime tenancies to all new tenants. There are currently 90 households on the housing register that have a housing need of 4 bedrooms and of those 54 are from Black or Asian backgrounds, any increase in availability of larger family properties is likely to have a positive impact on all races but the impact will be proportionately higher on BME groups in line with housing need. The long term impact of these policies will need to be monitored and in particular how they affect protected groups.</p> <p>The Housing Strategy highlights the Council’s intention to deliver around 25,800 new homes in the period 2015 – 35 across a range of tenures. The strategy should have a positive impact on all race groups but the impact will be proportionately more on BME groups in line with their presence in the homelessness statistics.</p> <p>It should be noted that on the Homebuy Register only 21% of applicants are from BME communities and this will be reflected in disposals. Any increase in the availability and range of products will benefit those already on the register and offers an opportunity to increase the reach of the scheme.</p>	Positive
	Religion/belief (including non-belief)	The revised Housing Strategy is not expected to have any impacts on people according to their religious beliefs	Neutral
	Sex	<p>61% of council tenants are women and the majority live on estates. Over 72% of main applicants on the housing register are women, 81% of main applicants in temporary accommodation are women and over 82% of main applicants where a homeless duty was accepted were women. 64% of allocations in 2013/14 were households with women as the main applicant.</p> <p>There is a marked difference in employment rates by gender with 61% of women aged 16-64 in employment to 74.2% of men. (Source – LBHF Draft SHMA 2014)</p>	Positive

		As well as the difference in employment rates women are more likely to be over-represented in low paid and part time employment. Therefore increasing the availability and quality of affordable rented accommodation in the borough will have a positive impact on both sexes but proportionately more on women in line with their representation in the statistics and economic status. 56.15% of HomeBuy applicants are women, increasing the options and models of HomeBuy available will have a positive impact on both sexes but particularly on women given their representation on the register.	
	Sexual Orientation	The Housing Strategy is not expecting to have any impacts on lesbian, gay or bisexual people	Neutral
<p>Human Rights or Children's Rights</p> <p>If your decision has the potential to affect Human Rights or Children's Rights, please contact your Equality Lead for advice</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>			

Section 03	Analysis of relevant data Examples of data can range from census data to customer satisfaction surveys. Data should involve specialist data and information and where possible, be disaggregated by different equality strands.
Documents and data reviewed	Hammersmith and Fulham Borough Profile 2014 LBHF Draft SHMA 2014 LBHF equalities data on council tenants 2013/14, housing demand as at 3/11/11, temporary accommodation as at 3/11/11, allocations 2013/14, duty acceptances 2013/14

	Disability Benefit Claimants – Borough Overview 2012/13 LBHF Older People’s Housing Needs/Gaps analysis 2014 LBHF Physical Disabilities Housing Needs/Gaps analysis 2014
New research	No new research was required

Section 04	Consultation
Consultation	<p>Details of consultation findings (if consultation is required. If not, please move to section 06)</p> <p>Consultation on the draft strategy will commence in early January 2015 and close on 27 February 2015. Following this there will be an analysis of responses.</p>
Analysis of consultation outcomes	This will take place following the close of the consultation process on 27 February 2015

Section 05	Analysis of impact and outcomes
Analysis	<p>What has your consultation (if undertaken) and analysis of data shown? You will need to make an informed assessment about the actual or likely impact that the policy, proposal or service will have on each of the protected characteristic groups by using the information you have gathered. The weight given to each protected characteristic should be proportionate to the relevant policy (see guidance).</p> <p>An analysis of consultation response will be undertaken at the end of the consultation period.</p>

Section 06	Reducing any adverse impacts and recommendations
Outcome of Analysis	Include any specific actions you have identified that will remove or mitigate the risk of adverse impacts and / or unlawful discrimination. This should provide the outcome for LBHF, and the overall outcome.

Section 07	Action Plan
Action Plan	Note: You will only need to use this section if you have identified actions as a result of your analysis

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