

## APPENDIX A:

### Equality Impact Assessment Initial Screening Tool with Guidance

This document has been produced to help you assess the likelihood of impacts on equality groups – including where people are represented in more than one strand – with regard to your new or proposed policy, strategy, function, project or activity. It has been designed to complement the e-learning tool for Equalities Impact Assessments and to help with your business planning process, as well as to ensure that your policy/project does not incur a delay due to lack of equalities consideration.

#### Initial Screening Equality Impact Assessment Tool

Section 01	Details of Initial Equalities Impact Screening Assessment
<b>Financial Year and Quarter</b>	10/11, Q3
<b>Name of policy, strategy, function, project, activity, or programme</b>	The Future of the Housing Management Service (new) This EIA assess the impact on service delivery. Any impact on staff will be the subject of a separate assessment as per TUPE guidelines for H&F Homes staff, and the Council's own organisational change assessment (OCA) for H&F Regeneration staff.
<b>Q1 What are you looking to achieve?</b>	The management agreement with H&F Homes, the Council's Arms Length Management Organisation (hereafter: ALMO), ends on the 31 March 2011. This document equality impact assesses the proposal of the return of the housing service to the Council and the creation of a single Housing and Regeneration Department to the Council, thereby giving rise to the direct management of services in the future. This follows the outcome of the consultation with tenants and leaseholders on the Council's proposal to directly manage the housing service.
<b>Q2 Who in the main will benefit?</b>	Tenants and leaseholders are expected to benefit from an integrated service.  H&F Council (hereafter: H&F) and H&F Homes undertook a consultation with tenants and leaseholders as part of this proposal and in order to assess its viability. The data collected has been used here, complemented by borough statistics.  H&F asked H&F Homes to undertake a comprehensive consultation programme. The consultation process

started on 6 August 2010 and ended on 12 November 2010. It consisted of three phases:

- a. General communications or awareness raising
  - i. Personalised letter to tenants, leaseholders, TRAs and voluntary sector groups
  - ii. Web and telephoned based communication – ‘Your questions Answered’ document, interactive webpage for residents and a dedicated telephone helpline
  - iii. Face to face communication e.g. Leaseholder Forums and panels, Borough forums, Equality Champions, Voluntary Groups and HAFFTRA meetings
  
- b. Qualitative consultation (focus groups and in depth interviews)
  - i. Focus groups involving residents including BME and young residents, a Women’s group etc
  
- c. Test of opinion using postal and telephone survey

H&F Homes has undertaken a separate EIA focusing on the consultation process. This section of the EIA uses the outcomes of that consultation to assess the impact on service delivery by equality group. Diversity data (race, gender, disability) was collected for the postal and telephone surveys.

The findings from the postal survey demonstrate that the majority of tenants are in favour of the Council’s proposal. In total 2074 surveys were returned<sup>1</sup>. Overall 71% of respondents to the postal survey were in favour of the Council’s proposal, and only 5% of tenants oppose the Council’s proposal.

<b>Views on the Council’s proposal to bring back H&amp;F Homes</b>	<b>%</b>
Strongly in favour	58.9
Slightly in favour	11.3
<b>Overall in favour</b>	<b>70.2</b>
Do not mind either way	26.2
Slightly opposed	1.8
Strongly opposed	1.7
<b>Overall opposed</b>	<b>3.5</b>

Postal survey results, 1688 respondents out of 18,157 posted

The return rate was 11% which might indicate that the vast majority of tenants and leaseholders are indifferent about the proposal, i.e. they may no mind who delivers the service. The return rate might also be

<sup>1</sup> 1743 tenants responses ensures that the findings accurately reflect the views of the general tenant population at a 95% confidence level of + or – 3%.

slightly lower than expected because tenants and leaseholders may have used other opportunities to engage with H&F Homes over the proposal.

Race	/	L	Primary tenant by race (source date: H&F Homes)	
			<b>Racial category</b>	<b>% of tenant holder</b>
			African	14
			Asian	4
			Caribbean	8
			Mixed	4
			Other	5
			Unknown	16
			White (includes non-British White groups)	49
				100
<p>The table above relates to the named tenant holder and may not reflect the full diversity of other individuals living in the same household (for example the primary tenant may be White but her/his partner might be Asian and their children may be mixed) and so this EIA notes the limitations of the data below.</p> <p>The predominant ethnicity of ALMO tenants is White British, accounting for 61% compared to 49% of primary tenants being White (this will include non-British White groups such as Eastern European). White residents are under slightly under represented in terms of being Council housing tenants compared to the overall White resident population in H&amp;F as per our borough profile (Census 2001).</p> <p>Tenants of non-White ethnicity (African, Asian, Caribbean, Mixed and Other) make up 35% of Council housing tenants and therefore are over represented compared to their overall number in the borough which is 22%.</p>				
<p>Test of Opinion (postal survey), Tenants in favour of H&amp;F Homes coming back to the Council, by race</p>				

					White	Asian or Asian British	Black or Black British	Chinese	Mixed	Other	Prefer not to say	Unknown	Total
				Yes	72%	74%	66%	57%	72%	61%	*	70%	71%
				No	3%	2%	3%	0%	10%	6%	*	6%	4%
				Don't mind	25%	24%	30%	43%	17%	32%	*	23%	25%
					100%	100%	99%	100%	99%	99%	*	99%	100%
<p>A significant number of Chinese respondents stated that they did not mind (with the majority in favour), and the majority of respondents in each race group who responded to the postal survey were in favour of H&amp;F Homes returning to the Council.</p> <p>Leaseholder consultation and focus groups were also held. No equality issues in relation to race was raised at the Leaseholder Forum, Resident Steering Group, or Equality Champions Group.</p> <p>As noted above, BME tenants are over represented in H&amp;F Homes units when compared with the borough profile and White tenants are under represented. The consultation shows that the majority of tenants by all race groups were in favour of the ALMO returning to the Council. The consultation did not find evidence of any negative impacts, and as the proposal is to maintain service provision with no major changes, the overall impact on race is assessed here as being both low and neutral.</p>													
Disability	/	L	The disability status of the primary tenant										
			<b>Disability status</b>								<b>% of tenant holder</b>		
			Disabled								8		
			Not disabled								92		
											100		
<p>Disabled people are significantly under represented as the primary tenant at 8% compared to the borough wide figure which is 15%<sup>2</sup>. The proportion of disabled people, who are not necessarily the primary tenant, living in council houses is</p>													

<sup>2</sup> H&F Single Equality Scheme: p6  
Updated 20.09.2010

likely to be higher.

H&F Homes's Equalities Champions Group (ECG) was involved with designing the ALMO consultation methodology. The ECG recommended that the independent telephone poll with the booster sample of respondents with a disability as an example of best practise and advised that it should be incorporated in all large scale consultation exercises.

This approach is also an example of: promoting equality of opportunity between disabled persons and other persons, promoting positive attitudes towards disabled persons, encouraging participation by disabled persons in public life, and taking steps to take account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than other persons.

The results of this booster sample are shown in the table below.

Telephone survey booster sample of 504 respondents organised by disability status (212 of the respondents self classified themselves as disabled). People who were deaf/hard of hearing had the option to completing the original postal survey.

	<b>Not Disabled</b>	<b>Disabled</b>	<b>Total</b>
Yes	52%	58%	54%
No	5%	10%	7%
Don't mind	43%	33%	38%
	100%	101%	99%

The vast majority of disabled tenants were either in favour (58%) or indifferent (33%) to the proposal. Only 10% of disabled respondents disagreed with the proposal.

Leaseholder consultation and focus groups were also held. No equality issues in relation to disability was raised at the Leaseholder Forum, Resident Steering Group, or Equality Champions Group.

As noted above, disabled tenants are well under represented in H&F Homes units when compared with the borough profile. The consultation proactively sought the inclusion of disabled people in order to gauge opinion, taking into account the barriers that can be experienced by disabled people.

			<p>The consultation results show that the majority of tenants by disability and non-disability were in favour of the ALMO returning to the Council, with the next largest group responding that they did not mind. The consultation did not find evidence of any negative impacts, and as the proposal is to maintain service provision with no major changes, the overall impact on disability is assessed here as being both low and neutral.</p>																																	
	Gender	/	L	<p>The gender of the primary tenant (excluding transgender)</p> <table border="1"> <thead> <tr> <th>Gender</th> <th>% of tenant holder</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>61</td> </tr> <tr> <td>Male</td> <td>39</td> </tr> <tr> <td></td> <td>100</td> </tr> </tbody> </table> <p>Women are over represented as the primary Council housing tenant compared to the proportion of females in the H&amp;F resident population, which is currently at 49.8%. Given this significant different in primary tenancy, the consultation results (below) should be analysed for any significant gap in opinion. We do not have specific data on transgendered or transitioning people, as official statistics are not routinely collected.</p> <p>Test of Opinion (postal survey), Tenants in favour of H&amp;F Homes coming back to the Council, by gender (excluding transgender).</p> <table border="1"> <thead> <tr> <th></th> <th>Female</th> <th>Male</th> <th>Unknown</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Yes</td> <td>68%</td> <td>75%</td> <td>70%</td> <td>71%</td> </tr> <tr> <td>No</td> <td>4%</td> <td>3%</td> <td>7%</td> <td>4%</td> </tr> <tr> <td>Don't mind</td> <td>28%</td> <td>23%</td> <td>23%</td> <td>25%</td> </tr> <tr> <td></td> <td>100%</td> <td>100%</td> <td>100%</td> <td>100%</td> </tr> </tbody> </table> <p>The vast majority of both female and male respondents were in favour of H&amp;F Homes returning to the Council. Only 4% of female respondents disagreed with the proposal compared to 3% of males.</p> <p>Leaseholder consultation and focus groups were also held. No equality issues in relation to gender was raised at the Leaseholder Forum, Resident Steering Group, or Equality Champions Group.</p>	Gender	% of tenant holder	Female	61	Male	39		100		Female	Male	Unknown	Total	Yes	68%	75%	70%	71%	No	4%	3%	7%	4%	Don't mind	28%	23%	23%	25%		100%	100%	100%
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			As noted above, women are over represented as the primary tenants. The consultation shows that the majority of male and female tenants were in favour of the ALMO returning to the Council. The consultation did not find evidence of any negative impacts, and as the proposal is to maintain service provision with no major changes, the overall impact on gender is assessed here as being both low and neutral.																
	Age	/	L																
				<p>The consultation did not collate data on age, and as age discrimination law does not currently apply to goods and services, this section refers to the results from the postal survey from earlier in this document and summarised again below.</p> <p>Postal survey results, 1688 respondents out of 18,157 posted</p> <table border="1"> <thead> <tr> <th><b>Views on the Council's proposal to bring back H&amp;F Homes</b></th> <th><b>%</b></th> </tr> </thead> <tbody> <tr> <td>Strongly in favour</td> <td>58.9</td> </tr> <tr> <td>Slightly in favour</td> <td>11.3</td> </tr> <tr> <td><b>Overall in favour</b></td> <td><b>70.2</b></td> </tr> <tr> <td>Do not mind either way</td> <td>26.2</td> </tr> <tr> <td>Slightly opposed</td> <td>1.8</td> </tr> <tr> <td>Strongly opposed</td> <td>1.7</td> </tr> <tr> <td><b>Overall opposed</b></td> <td><b>3.5</b></td> </tr> </tbody> </table> <p>As the proposal is to maintain service provision with no major changes, the overall impact on age is assessed here as being both low and neutral.</p>	<b>Views on the Council's proposal to bring back H&amp;F Homes</b>	<b>%</b>	Strongly in favour	58.9	Slightly in favour	11.3	<b>Overall in favour</b>	<b>70.2</b>	Do not mind either way	26.2	Slightly opposed	1.8	Strongly opposed	1.7	<b>Overall opposed</b>
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Sexual Orientation	/	L	The consultation did not collate data on sexual orientation, and so this section refers to the results from the postal survey from earlier in this document and summarised again below.																

Postal survey results, 1688 respondents out of 18,157 posted

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The duties under the Equality Act (Sexual Orientation) Regulations 2007, prohibiting discrimination on the grounds of sexual orientation in the relevant areas of: provision of goods, facilities and services; and in the exercise of public functions.

Official statistics are not routinely collected on sexual orientation. However, the most recent estimates on proportion of LGB adults living in UK is 1.5% in comparison to the general adult population<sup>3</sup>. Further, LGB adults will also be represented through one or more other equality strands.

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 we note that these local statistics may hide single LGB people, or LGB people who have not entered into civil partnerships.

Using the figure of 1.5%, as this refers to a whole adult population (and one must be 18 or over to hold a tenancy agreement), as a proportion of the overall respondents' opinions, we can see that the proposal would not impact on LGB people differentially.

As the proposal is to maintain service provision with no major changes, the overall impact on sexual orientation is assessed here as being both low and neutral.

<sup>3</sup> <http://www.statistics.gov.uk/statbase/Product.asp?vlnk=15381> and <http://www.statistics.gov.uk/pdfdir/ihs0910.pdf> (accessed 11.11.10)



	Religion/belief (including non-belief)	/	L	<p>The consultation did not collate data on religion or belief (including non-belief), and so this section refers to the results from the postal survey from earlier in this document and summarised again below.</p> <p>Postal survey results, 1688 respondents out of 18,157 posted</p> <table border="1"> <thead> <tr> <th>Views on the Council's proposal to bring back H&amp;F Homes</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Strongly in favour</td> <td>58.9</td> </tr> <tr> <td>Slightly in favour</td> <td>11.3</td> </tr> <tr> <td><b>Overall in favour</b></td> <td><b>70.2</b></td> </tr> <tr> <td>Do not mind either way</td> <td>26.2</td> </tr> <tr> <td>Slightly opposed</td> <td>1.8</td> </tr> <tr> <td>Strongly opposed</td> <td>1.7</td> </tr> <tr> <td><b>Overall opposed</b></td> <td><b>3.5</b></td> </tr> </tbody> </table> <p>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%).</p> <p>It is noted that members of some religious groups will also be represented through one or more other equality strands and that race and religion are often linked.</p> <p>The duties under the Equality Act 2006, make it unlawful (subject to certain exemptions) to discriminate on the grounds of religion or belief (including non-belief) in the following relevant areas:</p> <ul style="list-style-type: none"> <li>▪ The provision of goods, facilities and services;</li> <li>▪ The disposal and management of premises; and</li> <li>▪ The exercise of public functions.</li> </ul> <p>As the proposal is to maintain service provision with no major changes, the overall impact on religion or belief (including non-belief) is assessed here as being both</p>	Views on the Council's proposal to bring back H&F Homes	%	Strongly in favour	58.9	Slightly in favour	11.3	<b>Overall in favour</b>	<b>70.2</b>	Do not mind either way	26.2	Slightly opposed	1.8	Strongly opposed	1.7	<b>Overall opposed</b>	<b>3.5</b>
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	Socio-Economic	/	<p>L</p> <p>The consultation did not collate data on socio-economic status and so this section refers to the results from the postal survey from earlier in this document and summarised again below.</p> <p>Postal survey results, 1688 respondents out of 18,157 posted</p> <table border="1"> <thead> <tr> <th>Views on the Council's proposal to bring back H&amp;F Homes</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Strongly in favour</td> <td>58.9</td> </tr> <tr> <td>Slightly in favour</td> <td>11.3</td> </tr> <tr> <td><b>Overall in favour</b></td> <td><b>70.2</b></td> </tr> <tr> <td>Do not mind either way</td> <td>26.2</td> </tr> <tr> <td>Slightly opposed</td> <td>1.8</td> </tr> <tr> <td>Strongly opposed</td> <td>1.7</td> </tr> <tr> <td><b>Overall opposed</b></td> <td><b>3.5</b></td> </tr> </tbody> </table> <p>Hammersmith &amp; Fulham is ranked as the 38th most deprived local authority in England, out of a total of 342 local authorities. Hammersmith &amp; Fulham is becoming increasingly polarised in that there are increasing proportions of residents who are high earners with a static proportion of low earners. Census measures also show very high degrees of polarisation compared to other local authorities in educational attainment and occupation levels.</p> <p>Proportions of working age residents in higher-paid jobs are increasing. Four in ten adults (40.8%) are managers, senior officials or professionals compared to 35.9% in Inner London and 32.4% in Greater London. 17.9% 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 to 23.5% in 2001. On the other hand, 11.3% are in 'routine' or 'semi-routine' operations and 5.5% have never worked or are long-term unemployed.</p> <p>The duty to consider reducing the inequalities of outcome that arise from socio-economic disadvantage may be placed on public bodies when taking decisions of a strategic nature on how to exercise its functions. Presently, this is a provision of</p>	Views on the Council's proposal to bring back H&F Homes	%	Strongly in favour	58.9	Slightly in favour	11.3	<b>Overall in favour</b>	<b>70.2</b>	Do not mind either way	26.2	Slightly opposed	1.8	Strongly opposed	1.7	<b>Overall opposed</b>
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			<p>the Equality Act 2010 that ministers are still considering and which could come into force in April 2011.</p> <p>As the proposal is to maintain service provision with no major changes, the overall impact on all socio-economic groups is assessed here as being both low and neutral.</p>
<p><b>Q3</b>  <b>Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</b></p>	<p>Will it affect Human Rights, as defined by the Human Rights Act 1998?</p> <p>No.</p> <p>The most relevant Convention Right is Article 1, Protocol 1: Protection of property.</p> <p>During Phase 1 of the consultation (telephone enquiry line feedback), a small minority of tenants expressed concerns that the change of housing services management from the ALMO to the Council would mean that they could no longer live in their property. Once tenants were given assurances that the potential integration of the ALMO would not have any impact on their tenancy, the majority of the callers expressed no preference for whether the ALMO was returned in-house or not.</p> <p>No. The overall assessment is that the proposal has a low and neutral impact across all equality strands, and that it has no impact on Human Rights.</p>		

<b>Q4</b> <b>Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity, and/or adversely impact human rights?</b>	No. The overall assessment is that the proposal has a low and neutral impact across all equality strands, and that it has no impact on Human Rights.
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