

Initial Screening Equality Impact Analysis Tool

Section 01	Details of Initial Equality Impact Screening Analysis
Financial Year and Quarter	2010 / 2011 – Q4
Name of policy, strategy, function, project, activity, or programme	Housing Development Company
Q1 What are you looking to achieve?	<p>The Council recognises that there is an imbalance of tenures in the borough with a high proportion of both social (32 per cent) and private (23.4 per cent) rented accommodation and a low percentage of homeownership (44 per cent) when compared to London and England averages. (Borough Profile, 2010)</p> <p>The Quarterly House Price Index produced by the Land Registry puts the average house price in Hammersmith and Fulham, as the 2nd highest in London and the 4th highest in the England, at £472,000 (Jan, 2010). A similar picture exists in the private rental sector with the average weekly rental for a three bedroom property costing over £500p/w. (Borough Profile, 2010)</p> <p>The very high cost of market housing both for owner occupation and for private rent impacts on who can afford to live in the Borough. The household income required to rent a 2 bedroom property (lowest quartile rent) in the Borough is £56,100 and to purchase (lowest quartile market purchase) is £91,400. It is estimated that 58 per cent of younger working households (age 20-39 years) in H&F cannot afford to buy a 2/3 bedroom dwelling and private sector rents to earned income ratios are over 30 per cent. (Local Development Framework, 2010)</p> <p>In the social rented sector the average weekly rental for a property with the equivalent number of bedrooms (3) is in line with the London average of circa £80p/w. (Borough Profile, 2010) The disparity between the market rate and the social rented housing costs and the needs based letting criteria used in the social housing sector creates mobility issues and limited housing options for low to middle income groups within the borough. As a consequence these groups are poorly represented creating a</p>

relatively polarised population. Furthermore, over 8 per cent of the population of the Borough lives in overcrowded conditions, disproportionately represented in the social rented sector. (Borough Profile, 2010)

The Council has an aspiration to achieve new affordable housing as part of a comprehensive housing asset management strategy for its estates and land ownership. Current stock, excluding social rented, is circa 2 per cent of the total housing stock. It is proposed that the Council proceed to establish two corporate vehicles. The first vehicle would fund and contract to develop new and affordable housing and the second would be a Company with charitable aims registered with the Financial Services Authority for retaining the resulting affordable housing.

The creation of these two companies would enable the Council to achieve the following objectives and address the problem of housing affordability and reduced mobility for low and middle income groups:

Sale/development of properties:

- To enable the Council to maximise financial return on the sale/development of properties.
- To enable the Council to retain any affordable housing that is developed in such schemes within its portfolio.
- To give the Council greater control over the design of the scheme and ensure it delivers what the Council wants in the built environment

The role and governance of these companies will be subject to the general and specific equality duties introduced by the Equalities Act 2010. It will be embedded within the corporate strategy and policies of both companies. This means that both companies will have to have regard to the need to eliminate discrimination, advance equalities of opportunity and foster good relations when undertaking any functions.

The impact of establishing these two companies will be considered against the nine strands of equality below identifying whether the project will have a positive neutral or negative effect and to what extent.

This will be indicative at this stage and each individual site entered into either housing company will be subject to a detailed business plan and EIA assessment.

**Q2
Who in the main will**

Age	The development of both companies will be in compliance with the duty to which they are subject. In particular the Council recognises	+	M
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benefit?		the: <ul style="list-style-type: none"> Positive benefit for those on lower and mid-income to move into homeownership or provide more affordable housing products. 		
	Disability	The development of both companies will be in compliance with the duty to which they are subject. In particular the Council notes: <ul style="list-style-type: none"> That all new homes will be required to be built to life time homes standard In line with planning policy that 10 per cent of the properties to be wheelchair accessible, or easily adaptable for residents that are wheelchair users 	+	L
	Gender reassignment	The development of both companies will be in compliance with the duty to which they are subject.	+	L
	Marriage and Civil Partnership	The development of both companies will be in compliance with the duty to which they are subject.	+	L
	Pregnancy and maternity	The development of both companies will be in compliance with the duty to which they are subject.	+	L
	Race	The development of both companies will be in compliance with the duty to which they are subject.	+	L
	Religion/belief (including non-belief)	The development of both companies will be in compliance with the duty to which they are subject.	+	L

	Sex	The development of both companies will be in compliance with the duty to which they are subject.	+	L
	Sexual Orientation	The development of both companies will be in compliance with the duty to which they are subject.	+	L
<p>Human Rights and Children's Rights</p> <p>The development and operation of both companies will not affect Human Rights, as defined by the Human Rights Act 1998 or Children's Rights, as defined by the UNCRC (1992).</p>				
<p>Q3 Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</p>	Yes, through increased housing opportunities within the Borough, in particular affordable homes.			
<p>Q4 Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity, and/or adversely impact human rights?</p>	No			

Initial Screening Equality Impact Analysis Guidance

Section 01	Details of Initial Equalities Impact Screening Analysis
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<p>Name of policy, strategy, function, project, activity, or programme</p>	<p>A Policy refers to an approved decision, principle plan or a set of procedures by Cabinet, or a Cabinet Member under delegated powers that affects the way that the Council conducts its business both internally and externally. A policy can include: strategies, guides, manuals and common practice.</p> <p>A Strategy refers to a systematic short term or a long term plan of action that is designed to achieve a specific business benefit or goal(s).</p> <p>A Function refers to any actions and/or activities designed to achieve a specific business benefit or goal.</p> <p>A Project defines how a temporary structure or scheme can achieve a specific business benefit or goal(s). A project can be implemented by setting up aims and objectives, resources, communication, budget needs and timelines.</p> <p>An Activity is a specific task (or a groups of tasks) which can also form as part of a 'function'.</p> <p>A Programme is a portfolio of activities and projects that are co-ordinated and managed as a unit such that they realise common outcomes and benefits.</p>
<p>Q1 What are you looking to achieve?</p>	<p>For example this might help to implement outcomes identified in policies such as the Single Equality Scheme, Disability Equality Scheme, other EIAs in your service department, or in another department that your service/service users also interact with and draw down services from, Corporate Plan, LAA Targets, CAA Aims, UDP, or JSNA.</p>
<p>Q2 Who in the main will benefit?</p>	<p>Hereafter, 'policy' means policy, strategy, function, project, activity, or programme</p> <p>Disability Service providers also have an anticipatory duty to make reasonable adjustments for disabled people. These two duties frequently overlap and it is sensible to consider them together. For example, can you:</p> <ul style="list-style-type: none"> ▪ Provide accessible communications? ▪ Change how you collate and use data? ▪ Revise how you involve service users? <p>Analyse the impact of the policy on the protected characteristics with due regard to the Public Sector Equality Duty.</p>

Use your reasoning in order to determine whether the impact will be high, medium or low. What do we mean by these terms?:

High

- The policy, strategy, function, project, activity, or programme is relevant to all or most parts of the general duty, and/or to human rights
- There is substantial or a fair amount of evidence that some groups are (or could be) differently affected by it
- There is substantial or a fair amount of public concern about it

Medium

- The policy, strategy, function, project, activity, or programme is relevant to most parts of the general duty, and/or to human rights
- There is some evidence that some groups are (or could be) differently affected by it
- There is some public concern about it

Low

- The policy, strategy, function, project, activity, or programme is not generally relevant to most parts of the general duty, and/or to human rights
- There is little evidence that some groups are (or could be) differently affected by it
- There is little public concern about it

Use your reasoning to determine whether the impact will be positive, neutral, or negative. There are three possible outcomes:

- **Positive:** The EIA shows the policy is not likely to result in adverse impact for any protected characteristic and does advance equality of opportunity, and/or fulfils PSED in another way
- **Neutral:** The EIA shows the policy, strategy, function, project or activity is not likely to result in adverse impact for any protected characteristic and does not advance equality of opportunity, and/or fulfils PSED in another way
- **Negative:** The EIA shows the policy, strategy, function, project or activity is likely to have an adverse impact on a particular protected characteristic(s) and potentially does not fulfil PSED, or the negative impact will be mitigated through another means.

Should your policy not be applicable, you must note this and state why.

Human Rights, Children's Rights

Additionally, demonstrate here that the impact on **Human and/or Children's Rights** arising from the policy has been considered.

Human Rights

Public authorities have an obligation to act in accordance with the European Convention on Human Rights. These are:

- Article 2: [Right to life](#)
- Article 3: [Freedom from torture and inhuman or degrading treatment](#)
- Article 4: [Right to liberty and security](#)
- Article 5: [Freedom from slavery and forced labour](#)
- Article 6: [Right to a fair trial](#)
- Article 7: [No punishment without law](#)
- Article 8: [Respect for your private and family life, home and correspondence](#)
- Article 9: [Freedom of thought, belief and religion](#)
- Article 10: [Freedom of expression](#)
- Article 11: [Freedom of assembly and association](#)
- Article 12: [Right to marry and start a family](#)
- Article 14: [Protection from discrimination in respect of these these rights and freedoms](#)
- Article 1 of Protocol 1: [Right to peaceful enjoyment of your property](#)
- Article 2 of Protocol 1: [Right to education](#)
- Article 3 of Protocol 1: [Right to participate in free elections](#)

(Article 1 of Protocol 13 is: Abolition of the death penalty)

Each of the above links takes you to explanations and examples provided by the EHRC. Further, the [EHRC](#) and the [Ministry of Justice](#) both provide guides for public authorities.

Children's Rights (UNCRC)

All children and young people up to the age of 18 years have all the rights in the Convention. Some groups of children and young people - for example those living away from home, and young disabled people - have additional rights to make sure they are treated fairly and their needs are met.

Every child in the UK has been entitled to over 40 specific rights. These include:

	<ul style="list-style-type: none"> ▪ The right to life, survival and development ▪ The right to have their views respected, and to have their best interests considered at all times ▪ The right to a name and nationality, freedom of expression, and access to information concerning them ▪ The right to live in a family environment or alternative care, and to have contact with both parents wherever possible ▪ Health and welfare rights, including rights for disabled children, the right to health and health care, and social security ▪ The right to education, leisure, culture and the arts ▪ Special protection for refugee children, children in the juvenile justice system, children deprived of their liberty and children suffering economic, sexual or other forms of exploitation <p>The rights included in the convention apply to all children and young people, with no exceptions.</p> <p>The above and more information can be found at Direct Gov.</p>
<p>Q3 Does the policy, strategy, function, project, activity, or programme make a positive contribution to equalities?</p>	<p>Yes/No</p> <p>Use your evidence from Q2 to state why</p>
<p>Q4 Does the policy, strategy, function, project, activity, or programme actually or potentially contribute to or hinder equality of opportunity and/or human rights?</p>	<p>Yes/No</p> <p>If the answer here is 'yes', then it is necessary to go ahead with a Full Equality Impact Analysis. You should also consider a Full Equality Impact Analysis if your decision is likely to be of high relevance to equality, and/or be of high public interest.</p>