

## Community and Equality Impact Assessment

As an authority we have made a commitment to apply a systematic screening process to both new policy development or changes to services.

This is to determine whether the proposals are likely to have a significant impact on different groups within our community.

This process has been developed, together with **full guidance** to support officers in meeting our duties under the:

- Equality Act 2010.
- The Best Value Guidance
- The Public Services (Social Value) 2012 Act

As well as supporting you to look at whether there is, or will be, a significant impact, the guidance will also consider ways in which you might mitigate this in the future.

**About the service or policy development**

Name of service or policy	Housing Allocations Policy
Lead Officer	Michael Westbrook, Head of Housing and Asset Strategy
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**Why is this service or policy development/review needed?**

The Council's Housing Allocations Policy was reviewed in 2018, and recommendations on amendments to the policy were signed off by Cabinet in January 2019. Since then, a full consultation has been completed and the proposed changes approved. This impact assessment accounts for the impact and community assessment on the changes to the policy brought to Cabinet earlier this year, and outlines the consultation that has subsequently taken place.

The Borough Manifesto states that "We will remember that every resident has the right to rent, to move and invest in their home." The Allocations Policy has a part to play in seeking to ensure that there is mobility in the Council's owned housing stock, and that local residents benefit from the housing initiatives (such as the Local Housing Company, Reside) that the Council develops.

The Council's Equality and Diversity Strategy sets out the aim of providing Fair and Open Service Delivery; and the changes proposed to the Allocations Policy are aimed at ensuring that residents know what to expect from the services provided by Community Solutions and My Place; and that the housing allocations policy supports the aim of ensuring that no one is left behind.

It is good practice to review from time to time the impact of the Allocations Policy to make sure that the Council's intentions are being met by the Allocations Policy as it is working out in practice. The review, and subsequent consultation, has approved the following changes to the policy:

- To change some aspects of who may register with the applicant as a member of their household;
- To change the arrangements for dealing with cases which are referred to the Housing Options team for assistance from internal and external partners. The proposal is to establish collaborative working between the relevant services so that vulnerable households can be dealt with in a transparent and well-planned way;
- To create a smooth pathway that assists older people to access the right housing for their housing and support needs;
- To give Under Occupiers a higher degree of priority in order to release much needed family housing;
- To ensure that exceptional cases are dealt with in a transparent and equitable way;
- To improve the access to Reside homes for local working residents on moderate incomes.

The one change included in the final revised policy which was not part of the initial impact assessment is to include in the policy provision for local letting policies in the future. When a

Why is this service or policy development/review needed?

local lettings policy is proposed, a full equalities and community impact assessment will be carried out.

## 1. Community impact (this can be used to assess impact on staff although a cumulative impact should be considered).

What impacts will this service or policy development have on communities?  
Look at what you know? What does your research tell you?

*Consider:*

- National and local data sets
- Complaints
- Consultation and service monitoring information
- Voluntary and Community Organisations
- The Equality Act places a specific duty on people with 'protected characteristics'. The table below details these groups and helps you to consider the impact on these groups.

### **Demographics**

The changes to the allocations policy cover a range of areas and have different impacts on different groups of people. An assessment on the equalities and community impact of the changes was carried out for the January report, which is included below.

### **Demographics**

In 2016 the population of Barking & Dagenham was 207,000 and this is forecast to grow to 224,000 by 2021 and 240,000 by 2026. (GLA Central forecasts).

### **Age structure**

The main changes in age structure projected for Barking & Dagenham by ONS are a three percentage point (pp) decline in the proportion of children and a two pp decline in the proportion of young adults (15-34), offset by increases in older age groups.

ONS project a four pp increase in those aged 65 and over between 2016 and 2041 from 9% to 13%. This is a significant change, leading to an increase in the number of people aged 75 or more of between 6,500 between 2016 and 2041. For the 85+ age group who are most likely to make serious demands on care and related services, The GLA forecast that between 2016 and 2041 there will be an increase of 1,700.

### **Disability**

The Census 2011 indicates that around 16% of the population is estimated to have some form of limiting long-term health problem or disability (LLHPD), and 26% of households have at least one member with a LLHPD (7% have two or more). Six percent of residents' health is

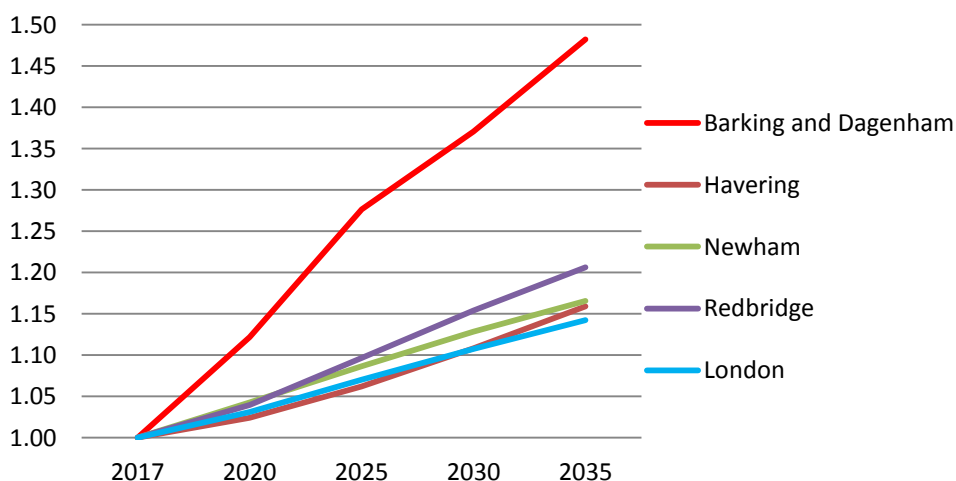
described as ‘bad’ or ‘very bad’. These figures are similar to neighbouring authorities, and marginally worse than London averages.

Data from 2014 shows that the proportion of women with a disability free life at 65 is 33.3% in Barking and Dagenham, compared with 64.7% in Sutton (best performing London Authority) and the same figures for men are that 42% men have an expectancy of life with a disability with a disability in Barking and Dagenham, whilst in Sutton the proportion of men with a life expectancy with a disability at 65 is only 28%.

The GLA household estimates from 2015 show that the proportion of the working population with a disability in Barking and Dagenham, is 17.2% compared with 16.1% across London as a whole.

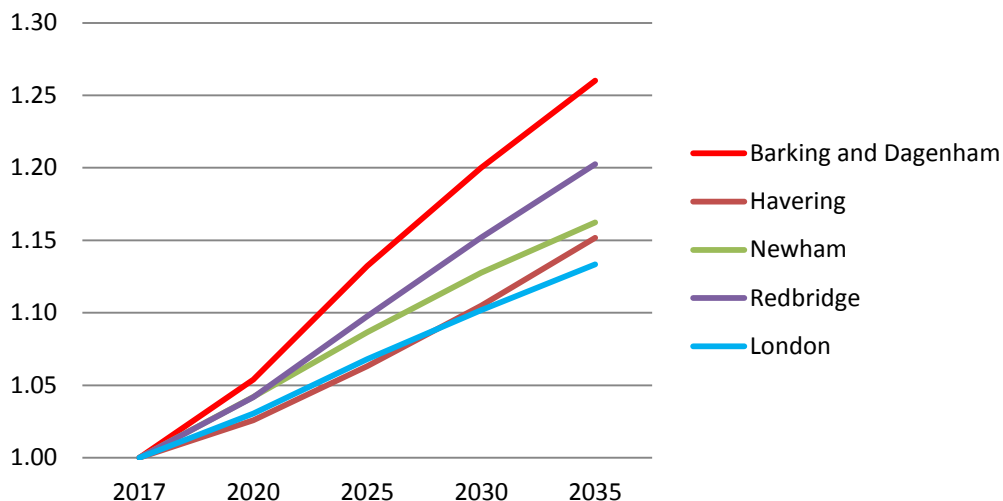
**Learning difficulties**

For younger people, people with learning difficulties, the profile contrasts strongly with that for older people: because of the relatively young demographic in Barking and Dagenham compared to neighbours (and the London average) the rate of increase for all the factors is faster and sharper than elsewhere. This is especially noticeable for the rate of increase of younger people with learning disabilities:



**Mental Health**

The anticipated rate of increase in numbers of people with an enduring mental health condition is similar:



**Ethnicity**

The ethnic make-up of the borough has changed since the 2001 Census. The proportion of the population who are White British has decreased from 81% in 2001 to 49% in 2011. This is projected to continue to decrease to 38% in 2017.

The representation of other ethnic groups has increased:

- The Black African population has increased from 4% in 2001 to 15% in 2011, and is estimated at 17% in 2017.
- The ‘Other White’ category has also increased (from 3% in 2001 to 8% in 2011, to an estimated 11% in 2017), which is likely to relate to increased migration from eastern Europe.
- There has been an increase in those of Indian, Pakistani and Bangladeshi ethnicity; together these groups accounted for 5% of the population in 2001, 12% in 2011 and are estimated to make up 17% of the population in 2017. Although the estimated proportions of these three groups in 2017 are similar (5.3% Indian, 5.5% Pakistani and 5.8% Bangladeshi), this represents a much larger increase for the Bangladeshi community since 2001, where these proportions were 2.2%, 1.9% and 0.4% respectively.
- 2015 estimates show that 37.8% of the population of Barking & Dagenham was born abroad, compared with 36.6% across London overall
- The same GLA estimates who that 49.5% of the population of Barking & Dagenham is from a Black and Minority Ethnic Group, compared with 42.5% across London as a whole.

Potential impacts	Positive	Neutral	Negative	What are the positive and negative impacts?	How will benefits be enhanced and negative impacts minimised or eliminated?
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<b>Local communities in general</b>	X		<p>The changes to the allocations policy have a range of impacts, which are set out below.</p> <p>All changes received majority approval in the consultation, completed by a range of residents and stakeholders.</p>	
<b>Age</b>	X		<p>The proposal to establish a joint collaborative panel between Community Solutions and Adult Social Care to discuss the best rehousing options for older people will have a beneficial impact on the older age group of the community.</p>	<p>Terms of Reference for the Panel will be agreed between the parties. Community Solutions, Adult Social Care and My Place will work together to ensure a smooth and effective pathway for older people needing a different housing solution.</p>
<b>Disability</b>	X		<p>The method by which adapted homes are being allocated is not changing; there will just be a more explicit explanation of the process in the new Policy.</p> <p>The proposals to establish a collaborative panel between Community Solutions and Adult Social Care will benefit vulnerable households, especially those containing someone with a long term enduring mental health need, people with learning disabilities, and other vulnerable groups.</p>	<p>The changes improve the transparency of the process and will improve the understanding of applicants in how homes are allocated.</p>
<b>Gender reassignment</b>		X	<p>We do not collect data on gender</p>	N/A

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			re-assignment who are applicants and therefore cannot assess the impact of any changes	
<b>Marriage and civil partnership</b>		X	The changes will have no impact on households with different marital or partnership status.	N/A
<b>Pregnancy and maternity</b>		X	There are no proposals that will have any impact on households which contain a pregnant woman, and the changes	N/A
<b>Race (including Gypsies, Roma and Travellers)</b>	X		X The changes in access to Reside properties show that more households on lower incomes will be able to access these properties. The Family Resources Survey main facts and figures show that over the period studied, just under one-third of households in the UK had a weekly income of below £400 (before tax and National Insurance was deducted), and just over one-third had a weekly income of £800 or more  Black households were most likely out of all ethnic groups to have a weekly income of less than £400, and Indian households were most likely to have a weekly income of £1000 or more. However, it does not appear that there is an	There will continue to be regular ethnic monitoring of all lettings, including social housing and affordable housing and any adverse impacts reported.

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			<p>adverse imbalance in BME households accessing Reside properties. From the first phase of lettings, it can be seen that 76% of lettings went to a household from a BME background and 22% went to households with a White background. 2% declined to state their ethnicity.</p> <p>The proposal to more closely define the household who may register with an applicant is likely to have a differential impact on BME households.</p> <p>Recent statistics from the Housing Register show that 201 households on the register will be affected by this proposal, of which 25% are from an African background. However, the impact is more notional than real, as larger households are unlikely to be housed as a result of the scarcity of such properties. The important change is that households will be informed on the consequences of registering members of a large household together and the likelihood of the waiting time.</p>	
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<b>Religion or belief</b>		X		There are no proposals that will have any impact on households of any particular faith	N/A
<b>Sex</b>	X			The proposal to enable ore households to access Reside Homes on lower incomes will be of indirect benefit to women, as female headed households tend to have a lower level of income than male headed households. In London 55% of low paid jobs are held by women, and more women are likely to be in part time work. These proposals will therefore benefit women and those on lower incomes. The proposal to improve the arrangements for older people are also likely to be of benefit to women, as they are more highly represented amongst the older population over the age of 70.	
<b>Sexual orientation</b>		X		There are no proposals that will change the way in which people who are lesbian, gay, or bisexual are treated.	Civil partnerships are already recognised within the Allocations Policy; there are no proposals to change this.
<b>Any community issues identified for this location?</b>	X	X	X		This Policy applies Borough wide and is not location specific.

## 2. Consultation.

Provide details of what steps you have taken or plan to take to consult the whole community or specific groups affected by the service or policy development e.g. on-line consultation, focus groups, consultation with representative groups?

The review of the Allocations Policy consulting internal partners including:

- Adult Social Care
- Children's Services
- Community Solutions
- My Place
- Lead Member for Regeneration and Social Housing

An extensive public consultation took place across 12 weeks, with the following stakeholders invited to take part:

- Consultation with current applicants on the waiting list
- Consultation with Housing Association partners
- Consultation with Voluntary sector partners

The consultation took the form of a leaflet and questionnaire which was present on the Council's website and sent out to relevant groups. Tenants were consulted through their newsletter and the open meeting of the tenants' federation on 20th February 2019 where there was a presentation on the proposed changes to the policy.

The consultation took place for 12 weeks between 04/02/19 and 29/04/19. It received 251 responses. All changes received majority positive responses in the consultation. Detailed results are included in the full cabinet report.

The consultation did not ask for demographic information and was completed anonymously, though due to self-identifying responses entered in the 'any other comments' we can deduce that 5 of the 251 were housing association and voluntary sector partners. The rest were residents including current housing applicants on the waiting list.

### 3. Monitoring and Review

How will you review community and equality impact once the service or policy has been implemented?

*These actions should be developed using the information gathered in **Section 1 and 2** and should be picked up in your departmental/service business plans.*

Action	By when?	By who?
There will be regular collection of data on who benefits from the allocations of homes made to households on the Social Housing Register and the Affordable Housing Register. This information is available for interrogation but is not reported to any particular body.	Every application is required to record standard monitoring information	Community Solutions
There will be a review of the operation of the Allocations Policy six months after implementation	October – Nov 2020	Inclusive Growth

### 4. Next steps

It is important the information gathered is used to inform any Council reports that are presented to Cabinet or appropriate committees. This will allow Members to be furnished with all the facts in relation to the impact their decisions will have on different equality groups and the community as a whole.

Take some time to précis your findings below. This can then be added to your report template for sign off by the Strategy Team at the consultation stage of the report cycle.

#### Implications/ Customer Impact

The changes to the Allocations Policy are generally designed to improve the operation of the process of deciding and allocating homes. Currently a number of decisions are made by officers interpreting the current policy, but often using judgement which is not explicit and publicised. The changes will make the allocation of new homes more transparent and enable applicants to have a better understanding of the process and why they have been successful or not in their efforts to obtain council or affordable housing.

The positive impact on groups with protected characteristics have been set out – particularly those that enable households with more modest incomes to access the affordable housing managed by Reside. Vulnerable households such as those with disabilities, mental health issues, or learning disabilities will benefit from a better service generated by improve co-operation between services and discussions at a Panel to ensure that the full range of options for housing are considered for older people.

The only potential negative impact is that relating to extended families, where the proposed change to the policy is to define the household that can apply together as three immediate generations – parents, children and grandparents. Households will not be able to register their extended families, such as uncles, aunts, adult brothers and sisters or in-laws on the

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application. This step is being taken because of the lack of larger properties, and the fact that it is not helpful to these households to register them together for property which is not available. The proposal should ensure that such households have better information about what is available and make better choices about how to seek housing.

### 5. Sign off

The information contained in this template should be authorised by the relevant project sponsor or Divisional Director who will be responsible for the accuracy of the information now provided and delivery of actions detailed.

Name	Role (e.g. project sponsor, head of service)	Date
Michael Westbrook	Head of Housing and Asset Strategy	9/12/19