

### Equality Impact Assessment

|                           |   |
|---------------------------|---|
| Name of service or policy | Review of the Allocations Policy  |
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#### Why is this service or policy development/review needed?

The Allocations Policy is one of the most important housing policies that the Council has, as it decides who is going to receive the benefit of a new Council home, or in the case of the Affordable Housing Register, the benefit of a Reside property.

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. This Review in particular is driven by some unintended consequences of the existing policy. These include:

- The way in which the Reside Allocations Policy operates has caused working households on modest incomes to be excluded from the Affordable Housing Register (the Waiting List for Reside properties)
- The way in which vulnerable households’ housing needs are assessed is too unplanned and unpredictable, and can lead to both high costs to the Council, and uncertain housing situations for applicants
- The way in which older people access appropriate accommodation needs improvement, so that there is better collaboration between Adult Social Care and Community Solutions and that older people benefit from the widest possible range of housing options;
- The Allocations Policy needs to be more explicit in the way in which some situations are dealt with, such as the children of separated families and extended families, so that applicants are clear what they are entitled to, and how the Council will treat their case.
- There needs to be specific Allocations Policy for the way in which applicants access Shared Ownership properties so that the Council’s resources in developing these homes are directed to benefit local people living and working in Barking & Dagenham above others

Why is this service or policy development/review needed?

- Greater priority is given to households who are under occupying their homes, so that the Council can make better use of the scarce resource of family sized homes.

## 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 & 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.

There are a range of changes proposed to the Allocations Policy that will have different impacts on different groups of people. The basic demographic data about groups affected is set out below followed by an analysis of the impact of the different changes on those groups, and others for whom we have less data.

### **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**

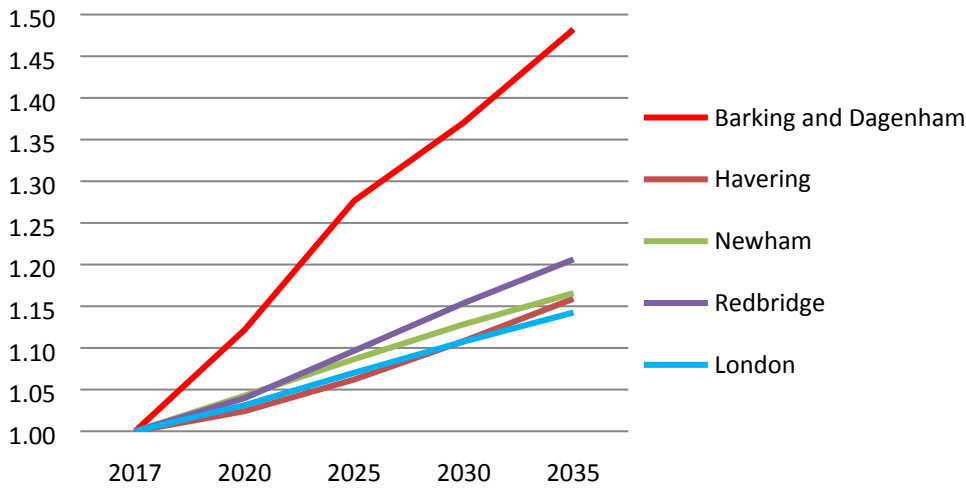
The Census 2011 indicates that around 16% of the population is estimated to have some form of limiting long-term health problem or disability (LLHPD), and 26% of households have at least one member with a LLHPD (7% have two or more). Six percent of residents' health is described as 'bad' or 'very bad'.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

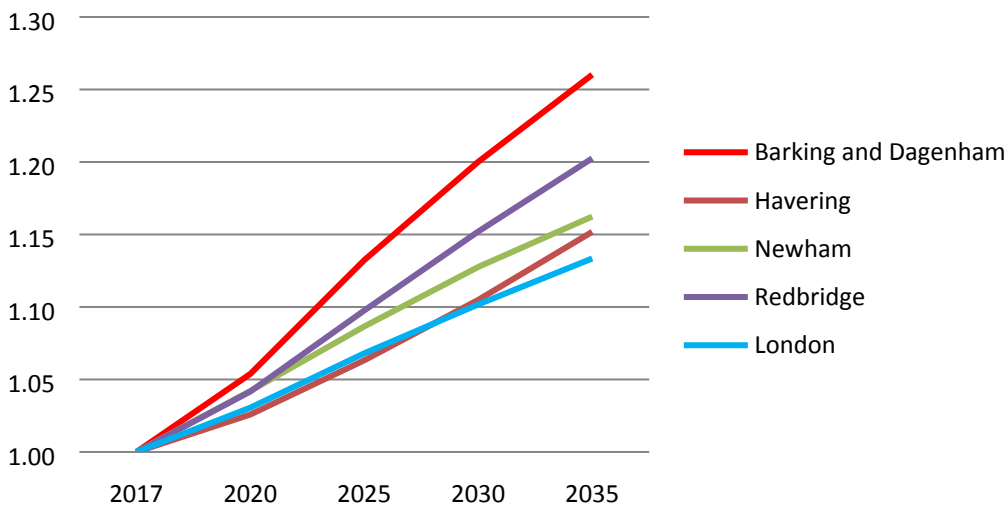
**Learning difficulties**

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?   |
|-------------------------------------|----------|---------|----------|---|---|
| <b>Local communities in general</b> | X        |         |          | The proposals have a range of impacts on the local community which are set out below.   |   |
| <b>Age</b>                          | X        |         |          | 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. | 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. |
| <b>Disability</b>                   | X        |         |          | The method by which adapted homes are being allocated is not changing; there will just be a more explicit explanation of the  | The proposals improve the transparency of the process and will improve the understanding of applicants in how homes are allocated.  |

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|  |   |   | <p>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> |  |   |
| <b>Gender reassignment</b>                           |   | X | <p>We do not collect data on gender re-assignment who are applicants and therefore cannot assess the impact of any changes,</p>   | N/A  |   |
| <b>Marriage and civil partnership</b>                |   | X | <p>The proposals will have no impact on households with different marital or partnership status.</p>  | N/A  |   |
| <b>Pregnancy and maternity</b>                       |   | X | <p>There are no proposals that will have any impact on households which contain a pregnant woman, and the changes</p>   | N/A  |   |
| <b>Race (including Gypsies, Roma and Travellers)</b> | X |   | X   | <p>The proposed 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</p> <p>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</p> | <p>There will continue to be regular ethnic monitoring of all lettings, including social housing and affordable housing and any adverse impacts reported.</p> |

|                                  |                |                  | <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. The 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> |  |      |                |                  |                |                  |      |     |     |     |      |      |      |      |     |      |
|----------------------------------|----------------|------------------|---|--|------|----------------|------------------|----------------|------------------|------|-----|-----|-----|------|------|------|------|-----|------|
| <p><b>Religion or belief</b></p> |                | <p>X</p>         | <p>There are no proposals that will have any impact on households of any particular faith</p>   | <p>N/A</p>   |      |                |                  |                |                  |      |     |     |     |      |      |      |      |     |      |
| <p><b>Gender</b></p>             |                | <p>X</p>         | <p>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</p>   | <p><b>Low-paid men and women</b><br/>Data source: Annual Survey of Hours and Earnings, ONS.</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Men, full-time</th> <th>Women, full-time</th> <th>Men, part-time</th> <th>Women, part-time</th> </tr> </thead> <tbody> <tr> <td>2015</td> <td>~70</td> <td>~50</td> <td>~60</td> <td>~110</td> </tr> <tr> <td>2016</td> <td>~100</td> <td>~130</td> <td>~80</td> <td>~150</td> </tr> </tbody> </table> | Year | Men, full-time | Women, full-time | Men, part-time | Women, part-time | 2015 | ~70 | ~50 | ~60 | ~110 | 2016 | ~100 | ~130 | ~80 | ~150 |
| Year                             | Men, full-time | Women, full-time | Men, part-time  | Women, part-time   |      |                |                  |                |                  |      |     |     |     |      |      |      |      |     |      |
| 2015                             | ~70            | ~50              | ~60   | ~110   |      |                |                  |                |                  |      |     |     |     |      |      |      |      |     |      |
| 2016                             | ~100           | ~130             | ~80   | ~150   |      |                |                  |                |                  |      |     |     |     |      |      |      |      |     |      |

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|   |  |   |  | <p>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.</p> |  |
| <b>Sexual orientation</b>                                 |  | X |  | <p>There are no proposals that will change the way in which people who are lesbian, gay, or bisexual are treated.</p>   | <p>Civil partnerships are already recognised within the Allocations Policy; there are no proposals to change this.</p> |
| <b>Any community issues identified for this location?</b> |  |   |  |   | <p>This Policy applies Borough wide and is not location specific.</p>  |

## 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 Allocations Policy proposed changes have been developed by consulting internal partners including:

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

This report is proposing that extensive consultation should take place over 12 weeks as follows:

- Consultation with current applicants and residents in temporary accommodation
- Consultation with Housing Association partners
- Consultation with Voluntary sector partners
- Consultation with representative groups representing those with disabilities, learning difficulties, people with a history of mental illness and Children leaving care

The consultation will take the form of a leaflet and questionnaire which will be present on the Council’s website, and sent out to relevant groups

Tenants will be consulted through their newsletter and neighbourhood forums

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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?



### 3. Monitoring and Review

| <p>How will you review community and equality impact once the service or policy has been implemented?<br/> <i>These actions should be developed using the information gathered in <b>Section 1 and 2</b> and should be picked up in your departmental/service business plans.</i></p> |   |                     |
|---|---|---------------------|
| 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 2019  | 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 wider community.

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  |
|--|
| <p>The proposed 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.</p> <p>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.</p> <p>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</p> |

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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 |
|--------------|--|------|
| Graeme Cooke | Director of Inclusive Growth                 |      |
|              |  |      |
|              |  |      |
|              |  |      |