

Housing, Finance and Corporate Services Policy and Scrutiny Committee

Date:	11 th September 2017
Classification:	General Release
Title:	Supply and Allocation of Social Housing 2017/18
Report of:	Executive Director for Growth, Planning and Housing
Cabinet Member Portfolio	Cabinet Member for Housing
Wards Involved:	All
Policy Context:	To promote the quality of life for Westminster citizens by working with all our partners to improve the housing experience of our residents and the safety and social care of vulnerable people and their families
Report Author and Contact Details:	Gregory Roberts grobert2@westminster.gov.uk 020 7641 2834

1. Executive Summary

1.1 All The purpose of this report is to update the Committee on the issues that will influence the allocation of social housing in 2017/18.

1.2 Part A: Affordable Housing Supply and allocation projections

1.3 This section sets out the level of available affordable housing in 2016/17 and how this is being allocated and the projections for new supply in 2017/18. Key points are:

- Social Housing allocations during 2016/17 show high levels of homeless rehousing reflecting the demand from this group
- Total social housing lettings for 2017/18 (including tenants' transfers) are estimated to be c. 770

1.4 Part B: Projections for demand for housing from homeless households in 2017

1.5 This section sets out the issues that will influence the numbers of households in Temporary Accommodation (TA). In summary key points are:

- The principal factor that is driving the high levels of homelessness continues to be the availability of private sector housing for households on benefits. Homeless acceptances were under 500 in 2016/17 a reduction of over 200 from 2012.
- A co-located service involving officers from Job Centre plus, Benefit Services and housing officers continues to respond to households in housing need as a result of the Benefit cap by supporting households into employment, assisting with finding alternative private sector accommodation, supporting claims for Discretionary Housing Payments and providing financial advice
- Total homeless acceptances during 2017/18 are forecast to continue at the same level of c. 500 and the total requirement for TA will remain between 2300 – 2650 during the year

1.6 Part C: Update on the delivery of the Temporary Accommodation Commissioning Strategy

1.7 The implementation of the TA Commissioning Strategy has succeeded in ending the use of B&B accommodation for families over 6 weeks, reduced unit costs, increased supply and made best use of Council resources. However challenges of sourcing sufficient private sector accommodation suitable and affordable for households in housing need continue.

1.8 Part D: Provision of housing for vulnerable groups

1.9 A range of services are commissioned to support the delivery of Council priorities for housing vulnerable people. This section provides a brief update on work in these areas

1.10 Key Matters for the Committee's Consideration

1.11 The report describes how the available affordable housing is allocated to different priority groups and how homeless prevention is the key focus of the work with households in need. The Committee is asked to comment on the work being undertaken to prevent homelessness.

Part A: Affordable Housing Supply and Allocation Projections

2. Housing Supply and Allocation in 2017/18

2.1 Allocation of Social Housing 2016/17

2.2 All social housing is let according to the authority's Housing Allocation scheme. The table below sets out the allocations in 2016/17 and reflects high levels of homelessness:

2016/17 Lettings	
Tenant transfers	Full year
Decants/Major Works including Returning Decants	10
Cash incentives to downsize	32
Community Care Nominations	0
Children Act Rehousing	1
Accommodation for the elderly	25
Overcrowded tenants	53
Transfers from studio to 1 bed properties	25
Category A medical for people with disabilities	31
Management Transfers	25
SUB TOTAL	203
Waiting list	
Homeless (inc older persons and Pathways)	355
Category A medical for people with disabilities	25
Accommodation for the elderly	54
Assisting Cash Incentive moves	5
Children Act Rehousing	13
Street Homeless and hostel move on quota	4
Second Succession	17
Staff Rehousings	0
Learning Disability Quota	2
Reciprocal nominations with other boroughs	8
Mental health hostel quota	11
Statutory overcrowded	0
Registered Providers severely overcrowded	1
Right to move scheme	0
Pan London moves scheme	2
SUB TOTAL (HR)	498
GRAND TOTAL TTL/HR	701

2.3 2017/18 Supply Projections

2.3.1 The initial projection for the supply of new lettings of affordable rented accommodation for 2017/18 is 770. This comprises the sum of casual voids from City West Homes, Registered Provider (RP) relets, RP first lets, spot purchases by WCH and CWH, delivery of infill schemes and tenant transfers. This is broken down as follows:

Supply by bedsize - 2017/18	Studio	1	2	3	4+	Total
CWH Casual voids	110	149	60	27	6	352
Return from long-term works	0	1	2	1	1	5
RP First Let Nominations - Affordable Rent	0	9	11	14	0	34
RP First Let Nominations - Social Rent	0	0	6	2	0	8
RP Relet Nominations - Affordable Rent	3	36	18	1	0	58
RP Relet Nominations - Social Rent	11	81	37	13	1	143
WCH/ CWH Spot purchases - Social Rent	0	0	10	3	0	13
CWH Infill schemes - Social Rent	0	1	5	12	8	26
Total Net Voids	124	277	149	73	16	639
WCC Transfers	43	64	27	9	1	144
Less Decants for major works	-2	-7	-3	-1	0	-13
Total Supply	165	334	173	81	17	770

2.3.2 The number of new affordable homes currently projected to be delivered by Registered Providers (RP) or directly by the Council during the period 2017/18 and 2018/19 is 565 units, made up of 515 new build or converted units plus 50 spot acquisitions. However it may be possible to increase this beyond the current projected figure of 50 through City West Homes or Westminster Community Homes in order to meet the temporary or permanent re-housing needs of residents affected by the Council's Housing Renewal programmes.

2.3.3 Included within the 565 new or converted homes during 2017 - 19, 37 are anticipated to be provided for social rent at target rents, 181 homes for affordable rent, 26 on City West Homes infill sites and 45 sheltered homes. The figures for social and affordable housing projected during 2017/18 are included in the table above.

The remaining homes will be provided as intermediate housing either at sub market rents or as shared ownership, and a further 50 spot acquisitions are anticipated to be provided for varying affordable housing types. These projections are based upon affordable housing developments that are currently under construction or have secured planning permission and are due to commence building works shortly. There is a possibility that some of the schemes that are scheduled to complete towards the end of quarter 4 2018-19 are likely to slip in to the following year 2019/20.

2.3.4 Significant new schemes that will contribute towards these 565 new affordable homes are:

- Ladbroke Grove, W10 a section 106 development being provided through Westminster Community Homes delivering 23 intermediate rent homes
- Lisson Arches, NW8 a council sheltered scheme delivering 45 homes on a housing renewal site
- Sentinel House, NW1 a section 106 development delivering 41 affordable rent homes
- North Wharf Gardens in Paddington, also a section 106 scheme where Octavia Housing will deliver 16 affordable rent and 11 intermediate homes

- 2.3.5 In addition to the 565 affordable homes anticipated to be delivered during the period 2017-2019, an additional pipeline of new housing developments exists that has the capacity to deliver c.1,300 additional affordable homes over a 5 year period starting from April 2019. This additional affordable housing supply will come from a mixture of sources including the Council's Housing Renewal areas and S106 development sites. Whilst some of the pipeline supply is under construction a number of schemes are yet to go on site or get planning consent.
- 2.3.6 Social Housing Relet supply from City West Homes is estimated to be 352 based on analysis of previous years' numbers.
- 2.3.7 An anticipated 201 relets from existing registered provider social housing stock is to be provided to the City Council during 2017/18. This projection is based on the average level of relets received by the City Council over the previous three years. 71% of relets to be provided during 2017/2018 are anticipated to be provided at rents equal to or below target rent levels, with the remainder at affordable rent levels

Part B: Projections for demand for Temporary Accommodation

3. Background Information

3.1 The Housing Options Service (HOS) provides the Council's statutory housing assessment and advice function. Local authorities have a statutory duty to provide housing under homelessness legislation, where the applicant's immigration status entitles them and they are:

- Homeless with no alternative accommodation that is reasonable to occupy
- In priority need
- Has a local connection (or no local connection elsewhere.)

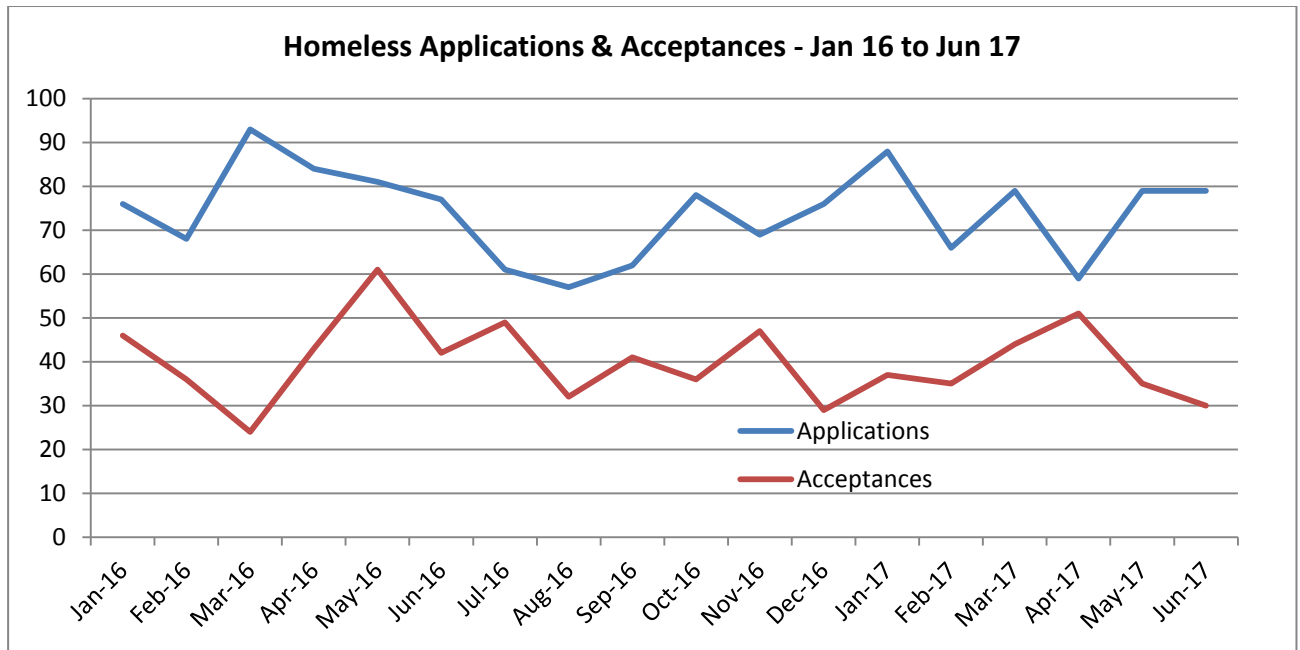
When the supply of suitable affordable accommodation is not available, the Council is required to procure Temporary Accommodation (TA) to provide housing until social housing is available.

3.2 The following table summarises the numbers of homeless applications and acceptances over the last five years and a more detailed monthly summary over the past 18 months

Demand Profile	31.3.12	31.3.13	31.3.14	31.3.15	31.3.16	31.3.17
Homelessness Applications (p.a.)	1445	1338	1002	1053	954	878
Homelessness Acceptances (p.a.)	539	813	705	617	511	496
Households in Temporary Accom.	1910	2450	2283	2397	2423	2518

3.3 The monthly homelessness and welfare reform updates circulated to Members highlight that whilst there are short-term fluctuations, homeless acceptances continue to be more than 70% higher than in 2010. There is a small difference between the 3 and 12 month

average for homeless applications (80 and 84) and acceptances (40 and 48) indicating that there has been a reduction in demand for housing over the past 12 months:



3.4 Private Sector Local Housing Allowance Claims

The number of households claiming Local Housing Allowance (LHA) in the private sector has reduced since the introduction of the original LHA caps in 2011 (see table below.) However the effects of the caps are still being felt and loss of private rented sector tenancies remains the primary driver of housing need in the borough increasing TA demand.

Bedsize	Claim numbers before 2011 Cap	Current total claim numbers	Reduction
1 Bed	3099	1858	1241 (40%)
2 Bed	1743	935	808 (46%)
3 Bed	766	375	391 (51%)
4 Bed	304	155	149 (49%)
TOTAL	5912	3290	2589 (44%)

In addition, in 2011 there were 761 Shared Room claims and there are now 476. It should be noted that the above figures will also include new LHA claimants since 2011 (with most London boroughs showing an overall increase as a result.)

3.5 A system has been set up to respond directly to those households in TA whose claims are capped and households in the private sector who made a DHP application, involving a co-located team including Job Centre plus, Housing Options and Benefit Services officers. All households in TA affected are contacted initially by the Council, a review of each case is completed and interviews are arranged with each household to agree the best way forward in the short and medium terms. Over 880 interviews have been held

with households affected by the Benefit Cap in TA agreeing over 1100 action plans, and almost 300 households have moved into employment.

Homeless Prevention and Forecasts

- 3.7 Homeless prevention remains the central focus of work with households in housing need, whether challenging illegal evictions, providing debt advice, supporting families to remain together and assisting with moves into the private rented sector. In the past 12 months 216 private sector prevention placements have been completed, 76 into properties in Westminster, 128 into other London boroughs and 12 outside of London. Over 100 moves into the private sector have been of accepted households living in Temporary Accommodation.
- 3.8 Most applicants currently wait 7-10 years for a social housing tenancy and a new policy framework has recently been introduced to identify more households for whom the private rented sector would be suitable and we have successfully started making offers to them to bring our duty to an end. To support this we commissioned a study of the affordability of the private rented sector to identify areas where suitable and affordable properties are available and this is informing the project to increase the numbers where we discharge of duty into a suitable property in the private sector. The study has highlighted however the challenges in sourcing private sector properties at or close to LHA rates and which would remain affordable for at least 2 years.
- 3.9 Given the pressures from homeless acceptances during 2016/17, the forecast for 2017/18, the continued pressures in securing properties for Temporary Accommodation and the uncertainty around the funding regime the percentage of total rehousing made available to homeless households (currently over 60%) are to be retained, in particular for larger units.
- 3.10 The principal factor that is driving the high levels of homelessness continues to be the availability of private sector housing for households on benefits. Homeless acceptances are 496 in 2016/17 a reduction of over 275 from 2012 and this level is expected to continue. As a result total homeless acceptances during 2017/18 are forecast to continue at c. 500 - 525 and the total requirement for TA will remain between 2300 – 2700 during 2018

Part C: Update on the delivery of the Temporary Accommodation Commissioning Strategy

- 4.1 The TA Commissioning Strategy was updated during 2017 as part of the wider update of homeless placement policies to reflect changes in the private sector housing market and the impact of legislative and welfare reform changes
- 4.2 The central assumptions within the strategy that a TA portfolio of at least 2000 units will be required until 2020 and that increasing the supply of units through the traditional model of leasing from the private sector at the government set TA subsidy rates would not meet this requirement remain valid. This is supported by the recent budget reports that highlighted the impact of high rental costs within the private sector.

- 4.3 Few families are now placed in non-self-contained accommodation and these are for short periods of time. Maintaining this remains a very high priority (at a time when other London authorities are reporting increased use of B&B including for families for more than 6 weeks)
- 4.4 Increasing supply of properties that are affordable and sustainable for households on low incomes, whether for use as Temporary Accommodation, for private sector discharge of housing duty or to prevent homelessness remains very challenging within the current housing market. This is particularly the case for family sized accommodation.
- 4.5 The Council continues to make use of its own properties that are temporarily vacant through the regeneration programme and currently makes use of c. 55 units. Whilst clearly not a long-term solution this has provided a source of in-borough accommodation.
- 4.6 The Council has entered into a programme of purchasing properties for use as TA outside the borough and has completed 100 purchases within Greater London and 45 within Westminster and these purchase programmes will continue during 2017/18.
- 4.7 The above strategy will continue to aim to deliver a reduction in unit costs of TA across the portfolio as a whole and ensure properties are affordable to households on benefits. At the same time the strength of the private market means that it is extremely challenging to maintain the existing properties when alternative markets are available and identify for purchase properties which are economic to purchase and rent to households on benefits.
- 4.8 To deliver a TA portfolio that meets budget targets remains dependent upon a central government set funding regime both for TA subsidy and to purchase properties directly that allows such activity to be economic and demonstrates clear value for money. Further announcements regarding the future of TA subsidy are expected during 2017/18 (in light of the introduction of Universal Credit and the understanding of the challenges of short-term housing placements of all types within the Universal Credit framework.) The Council will continue to set rents for TA properties in line with the maximum amount eligible for HB subsidy within this formula.
- 4.9 Current TA levels are c. 2518 and this represents an increase of a third since 2012. Before the increase 75% of TA was located in-borough with the remainder in East London. Since the increase whilst the in-borough stock has largely been retained, TA properties are now located in over half of London boroughs with less than 100 properties outside London, principally in Essex and half remains within Westminster.
- 4.10 There are legal criteria for the suitability of TA, taking in its physical aspects, location and considerations of affordability amongst other matters. The majority of households requiring TA are in receipt of benefits, and where accommodation is situated in-borough, this presents a financial challenge and/ or can only be provided above subsidy levels.

Part D: Provision of housing for vulnerable groups

A variety of services are commissioned to respond to rough sleeping, to support in particular the delivery of Council priorities to increase the numbers of people with learning disabilities and mental health problems living in settled accommodation and respond to incidents of domestic violence

6.1 The Westminster Learning Disability Housing and Support Plan

6.1.1 Increasing numbers of young people with a physical disability and a learning disability are living into adulthood. There is also an aging population of people with learning disabilities and ageing carers. Dementia and increased physical frailty amongst the aging population means that there is an increased need to provide more accessible and supported accommodation. Increasing numbers of young people with a physical and learning disability, and those with challenging behaviors, and autism are transitioning into adult social care.

Moving forward, there will be an increased need to develop purpose build, well designed accommodation to take into account the increased complexities of needs and ensure future accommodation continues to be fit for purpose.

6.1.2 Current Supply

In Westminster we have 160 supported housing properties for exclusive use for people with learning disabilities: 16% are in registered care homes; 84% are now supported living reflecting a move to increasing the availability of supported housing which offers more choice and control for people living there than registered care. The registered care units provide high needs support to people with complex needs and autism. The supported housing units offer a range of support, 43 of the supported housing units offer 24hr support which could be a waking or sleeping night "cover. There are also a further 21 units of floating support which can offer support to those who move on from home or a step down from the building based services.

There are 7 priority nominations for people with a learning disability to access main stream housing, which enables people to maximize their independence with minimal support.

In 2017, a new scheme, shared lives, will start to offer people with a learning disability the opportunity to live with a 'shared lives carer'. This scheme will suit people who may benefit from a 'family type' support. By the end of 2017 there will be 5 shared lives schemes operating within Westminster.

Work is currently going on to convert a building in the north of the borough into 3 1-bedroom flats for people with a learning disability. These will be completed by August 2017 and will add to the supported living scheme provision within the borough.

6.1.3 The updated Learning Disability Housing and Support strategy will encompass the following priority areas:

- People with a learning disability and/or autism and those who display behaviors that

challenge experience more choice and control in the range, quality and supply of local supported housing available as an alternative to out of borough residential care.

- People will have more access to new and improved high quality housing and support services that are fit for future needs.
- There will be robust data on needs and clear housing pathways and information on the range of accommodation and support available
- Housing and support services will maximize the opportunities for all people with learning disabilities to live ordinary lives in the community, in their own home. This is to include those with autism, complex and challenging needs.
- We will work alongside people with learning disabilities, families and carers when developing services
- We will work with our providers to ensure quality and that the work force development opportunities are taken up and we are in agreement with providers of the future workforce requirements.
- Regular inspection and monitoring of supported housing will be undertaken.

6.2 Housing Allocation and Domestic Violence

- 6.2.1 Violence Against Women and Girls (VAWG) remains a major focus for the department. The Housing DV lead continues to sit on the VAWG strategic group, executive group, and Housing Operational Group. Progress this year in the Housing Operational Group has focussed on working in partnership with Rough Sleeping team colleagues and commissioned services to ensure the needs of vulnerable VAWG victims who are street or hidden homeless are addressed. The Housing Operational Group has also begun working on developing a Housing First model and bringing together housing providers and support services across the three boroughs.
- 6.2.2 The Housing DV lead is Co-Chair of the Westminster Domestic Violence Forum (WDVF) and continues to support the development of the Butterfly Group, a peer mentoring programme for those who have/ are experiencing domestic violence, which is coordinated by the refuge provider Hestia. Joint work has already begun to examine the needs of refuge provision across the boroughs which will inform the re-commissioning process in 2017/18.
- 6.2.3 The department fully supports the operational work and development of the Multi Agency Risk Assessment Conference (MARAC) and continues to act as an example of good practice to other MARACs in respect of their housing input.
- 6.2.4 The Housing DV lead was actively involved in the recent Local Safeguarding Children Board Multi-agency perspective on Practice; examining the housing role in relevant cases.

6.2.5 The effectiveness of the response to VAWG issues at HOS continues to be monitored and quarterly statistics are provided to the Housing Operational Group for evaluation. Service Standards formulated by Standing Together against Domestic Violence (STADV) continue to be followed. The recent ITT for the new HOS contract includes the provision of an IDVA role within the front-line HOS service; a role that will also support staff training. The ITT also requires the new provider(s) to work towards the Domestic Abuse Housing Alliance (DAHA) accreditation; an accreditation that very few Local Authorities have or are currently aiming to achieve.

6.3 Mental Health and Housing

6.3.1. In Westminster we have developed a wide variety of housing related support services for people who experience severe and enduring mental health issues. There are 372 units of supported housing, ranging from high support 24 hour schemes to semi-independent units with visiting support. The schemes are managed by 6 housing providers. In addition there are over 550 units of floating support for people living in their own independent accommodation who require support to prevent the loss of tenancy.

6.3.2 The range of supported housing services has been expanded since the beginning of the Supporting People programme by opening six new mental health schemes and redeveloping a rough sleepers scheme to work with people with low level mental health problems. Referrals into these units will be for those clients who are highly functioning but with complex needs who ordinarily would be placed in a more specialist scheme out of the borough. Additional clinical support will be offered by the relevant Mental Health team.

6.3.3 Westminster Supported Housing is jointly commissioned by Housing, Adult Services and NHS Westminster. Individuals are supported to move from supported housing into independent living along a pathway of care and support as a joint process with the housing provider and the allocated Mental Health team care coordinator.

6.3.4 Access to the range of supported housing provision is via the Single Access referral Panel [SARP] The SARP has a multi-disciplinary membership including housing providers; the Housing Options service; floating support; ward managers; senior practitioners from the Mental Health team including an Occupational Therapist and the Commissioner for Mental Health accommodation. The SARP works to prevent homelessness and where possible avoids using out of borough expensive placements. This is achieved by ensuring that there is a steady flow of people through all of our in borough supported accommodation. Referrals are received from a wide variety of sources including for clients already living in supported who require a step down to less supported; directly from the wards; from out of borough projects; from individual's whose tenancy is breaking down for reasons related to mental health and family homes.

6.3.5 The SARP also agrees the Move-on Quota applications which agree access to independent accommodation for those service users currently in supported accommodation. Mental health services receive an annual quota of independent housing units from the City Council for people with mental health problems living in supported housing who are able to live independently. Readiness for independent accommodation is assessed robustly by care coordinators and housing providers and then again by the

SARP that accepts or rejects MHS quota applications. The panel only accepts applications for people where there is clear evidence about the service user's readiness for independent living. Once accepted onto the quota the SARP liaises closely with the Housing Options Service who have the capacity to restrict and delay bidding where it is felt that a situation has changed and people can be removed from the quota when necessary. Once people have moved there are a range of community support services available including floating support services that are able to support the person through the move, to settling in and establishing themselves in the community and other support provisions including flexi care, befriending and day services.

6.4 Supported Housing for Young People

- 6.4.1 138 units of supported and hostel accommodation are commissioned, managed by 4 different organisations for young people up to the age of 25. Services prioritise looked after children, care leavers, young parents and young people at risk of homelessness, and that services respond effectively to meet the needs of this client group improving life chances and opportunity.
- 6.4.2 The Young Persons Supported Housing Pathway continues to be an effective means of support and housing provision and the number of planned moves through the pathway remains above the target of 75% averaging at 85% and the number of Children Services Placements continues to increase annually.
- 6.4.3 Following a Pathway review a number of recommendations were put forward and the principle decision approved is to undertake competitive tendering of the current contracts to allow for the new remodel Pathway to commence from April 2018. A project group has been established made up of representatives from Children Services to inform and be involved in the competitive tendering process. As part of the process officers will consult directly with young people who will be invited to participate in the process.
- 6.4.4 Over the last year a number of initiatives have been developed with Children Services to support the numbers of numbers of unaccompanied asylum seeking children who have been placed in the Young Persons Supported Housing Pathway and these include:
- UASC support worker offering enhance support for up to month for all new UASC moving in the Young Persons Supported Housing Pathway. The primarily focus is to offer practical support accompany them to appointments and to help the young person to feel less isolated and to increase their confidence. During the year a review was undertaken and the feedback was positive from both young people and Children Services and it was recommended that funding be made available to extend the support provision for a further 6 months.
 - Recognising that UASC moving into a hostel need to develop their English language skills funding was made available to Cardinal Hume Hostel to extend their current offer to accommodate Westminster's UASC. A part time tutor has been recruited and supports the young people to progress English for Speakers of Other Languages (ESOL) and citizenship towards settlement. Children Services have agreed to continue funding this service for a further 6 months.

6.4.5 Supporting the City Council's wider agenda to increase the numbers of young people into Education, Employment and Training, the EET Pilot a strengths based programme was delivered in partnership with Children Services through the Young Persons Supported Housing Forum. The Programme runs for six months and each young person has a triangle of support, including a mentor, attendance at monthly workshops and workbook to complete. Themes explored include core self, belonging and learning. As part of the programme all young people also have to undertake research into their chosen career path, numeracy and literacy assessments, engage in volunteering in the hostels or in the local community and develop a new skill through undertaking a six week art project. A total of 13 young people not in education, employment and training attended the monthly workshops and it is anticipated that 8 young people will complete the programme and also achieve a Duke of Edinburgh Certificate.

7. Financial Implications

7.1 Housing Expenditure

7.1.1 The latest revised budget is as follows:

Service Area	Expenditure	Income	Total
Homelessness	7,248,344	(2,413,339)	4,835,005
Temporary Accommodation	45,865,951	(41,540,410)	4,325,541
Grand Total	53,114,295	(43,953,749)	9,160,546

7.1.2 There are no direct financial implications arising from this report.

8. Legal Implications

8.1 The Council has a duty under the Housing Act 1996 (Part VII), as amended by the Homelessness Act 2002 to ensure that accommodation is made available for homeless applicants who are owed a full housing duty by the Council.

8.2 The Council also has a duty to maintain a housing register under the Housing Act 1996 (Part VI) as amended by the Homelessness Act 2002.

8.3 By virtue of Section 1 of the Homelessness Act 2002 many Housing Authorities are required to prepare and update a homeless strategy. However, being an excellent authority, the City Council is exempted from that requirement by virtue of Article 3 of the Local Authorities' Plans and Strategies (Disapplication) (England) Order 2005. This is a non statutory report prepared outside the homelessness regime

8.4 As a public authority, the council must take account of the provisions of the Human Rights Act 1998 and not act in a way which is incompatible with a Convention right. Under Article 8, any interference with the right to respect for a person's private and family life and home must be proportionate and Article 14 requires that there must be no unjustified discrimination within the scope of human rights on any grounds, such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

8.5 The Equality Act 2010 introduced a public sector equality duty which requires the City Council when making decisions to have due regard to the need to

- eliminate discrimination, harassment, victimisation and any other conduct that is unlawful under the Equality Act 2010;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- and foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

8.6 The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation. The City Council is required to act in accordance with the equality duty and have due regard to the duty when carrying out its functions.