



City of Westminster

EQUALITY IMPACT ASSESSMENT TOOL

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The Council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an EIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

When you should undertake an EIA:

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making staff redundant or changing their roles (particularly if it impacts on frontline services).
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding).

Who should undertake the EIA:

- The person who is making the decision or advising the decision-maker

Guidance and tools for completing EIAs are available on the WIRE:

<https://officesharedservice.sharepoint.com/sites/intranet/wcc-comms/Pages/Equality-Impact-Assessments-.aspx>

An EIA e-learning module is available for all Westminster staff:

www.learningpool.com/westminster/course/view.php?id=159

When you have completed an EIA, please send the final copy to Equalities@westminster.gov.uk

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

Title
Local Lettings Plans for the Infill Programme
<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the purpose of the policy/project/activity/strategy? • In what context will it operate? • Who is it intended to benefit? • What results are intended? • Why is it needed?
<p>This EIA analyses the proposal to let social homes developed through the council's Infill Programme to local people that have priority for housing – through a Local Lettings Plan – rather than to <u>any</u> household that has priority for housing.</p> <p>The council has an Infill Programme – which means that within its existing housing portfolio the council will be developing new affordable housing on/in:</p> <ul style="list-style-type: none"> • Vacant land adjacent to housing blocks • The rooftops of existing blocks • Vacant spaces such as basements, drying rooms and storage areas • Underutilised garages and storages areas <p>25 new affordable homes will be developed during Phase 1 and further new homes will be developed in future phases. The majority of the new social homes developed will have 2 bedrooms or reflect the need for this type of housing. Wheelchair accessible units may be developed where possible.</p> <p>The reason/s for the Local Lettings Plan are to:</p> <ul style="list-style-type: none"> • Achieve support from local residents for the Infill Programme which is a way of increasing the supply of social housing to meet demand. Currently there are 4,500 households with priority for social housing and only c700 social lets each year. Subsequently people face very long waits for social housing. Without this support from residents some opportunities may not proceed • Recognise the impact of the Infill Programme on local people i.e. the disruption from building work in a close proximity to them and the loss of some amenity space i.e. storage units and car park spaces are converting to new homes. The nature of the Infill Programme means the disruption is different to standard new development in an area. <p>As schemes are being progressed the council consult with local residents. The opportunity for local households to derive benefit from the new schemes was raised by residents at the initial consultation sessions held in May 2017. The prospect of a Local Lettings Plan was discussed with some local residents who supported the approach.</p> <p>The 25 units that are being developed in Phase 1 will be across a number of wards and the Director of Housing and Regeneration, in consultation with the Cabinet Member for Housing, will decide on the boundaries for Local Lettings Plan Area to determine where households will have priority for the new homes. This decision will be made on a case by case basis taking into account:</p> <ul style="list-style-type: none"> • The number of new units being developed • The location of the new units • The number of people with priority for housing in the local area • The extent of the impact of the development locally

In some cases the Local Lettings Plan Area might be defined as the whole ward, and in others an estate.

The first let of all the new social homes, developed through the Infill Programme will be to households with priority in the Local Lettings Plan Area. The homes will either be let through choice based lettings or by direct offer in the way set out in the Allocations Scheme. If there are no households with priority for housing in the Local Lettings Plan Area they will be let in the normal way.

The exception to this is wheelchair accessible homes which will be let to the household on the whole register with the highest priority – although if a household in the Local Lettings Plan Area has equal priority it will be let to them. This approach reflects the acute shortage of these properties as the table below shows and that the council needs to make the best use of supply to meet need. It also reflects that acute impact not having the right sort of housing will have on a disabled person.

Demand for wheelchair accessible properties and supply

	2013/14	2014/15	2015/16	2016/17
Demand	12	30	41	24
Supply	12	15	27	14

Impact of the policy on different groups

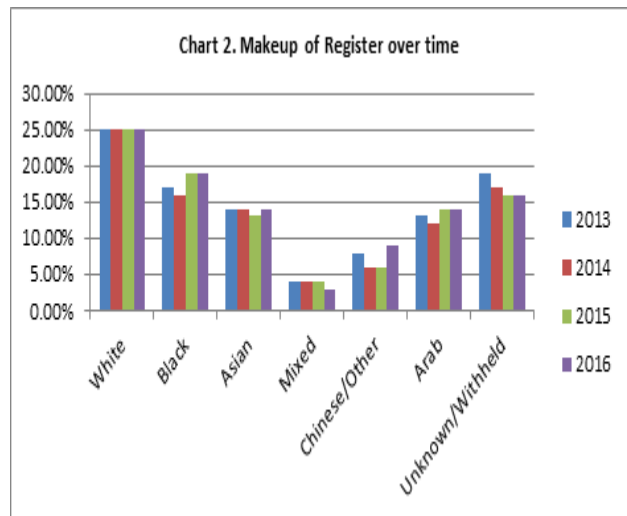
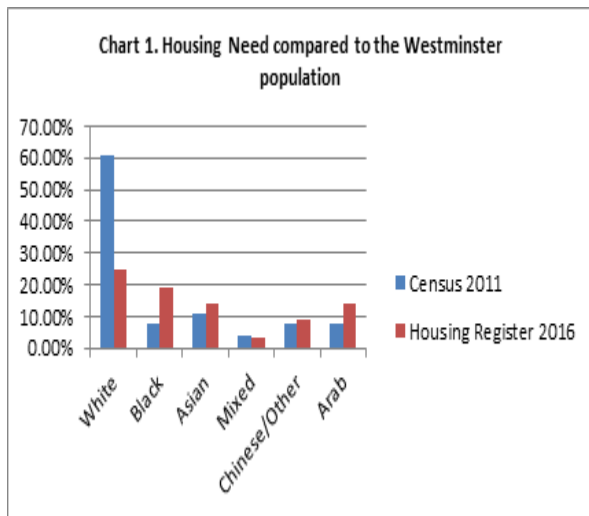
All those with priority for housing, either in the Local Lettings Plan Area or outside it, will be affected by the policy. By allocating the homes from the Infill Programme to local people in the Local Lettings Plan Area - it might be argued that other households with priority for housing (possibly with higher needs and that have been waiting longer) will negatively impacted.

The Allocations Scheme 2017 sets out the households that have priority housing and these in the main follow the legal requirements in section 167(2) of the Housing Act 1996 which requires that the allocations system gives “reasonable preference” to people in five groups:-

- People who are homeless (within the meaning of Part VII (7) of the Housing Act 1996, as amended by the Homelessness Act 2002)
- People who are owed a duty by any local housing authority under section 190(2), 193(2), or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3)
- People occupying unsanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions
- People who need to move on medical or welfare grounds (including grounds relating to a disability); and
- People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or to others)

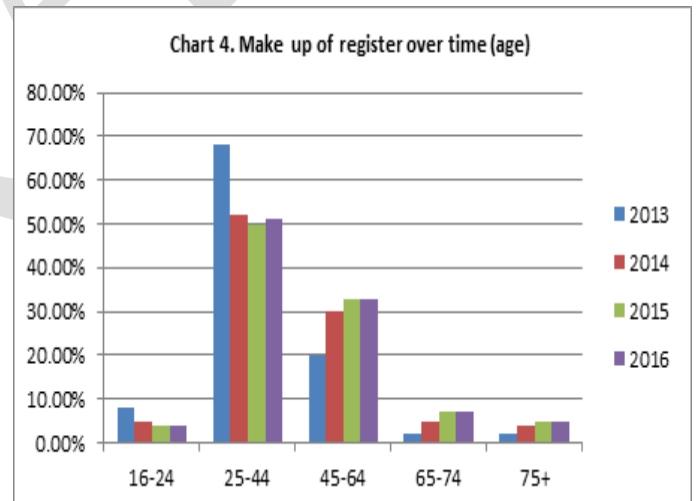
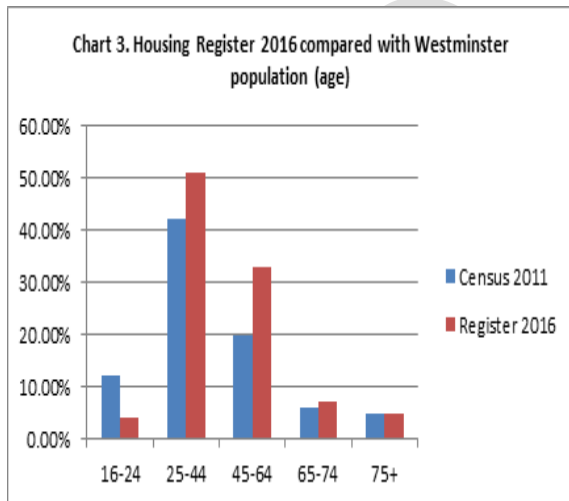
As the following tables/charts show, the households with priority for housing across Westminster are more likely to have “protected characteristics” as defined in the Equality Act 2010, compared with the Westminster population.

Ethnicity



As the above charts show, all ethnic groups – with the exception of the White group - have a disproportionately higher need for housing compared with their share of the Westminster population. 38% of applicants need three or more bedrooms, and some ethnic groups have an above average need for these larger homes i.e. 55% of Asian and 54% of Arab households needed larger homes.

Age



As the above charts show people in the 25 – 44 have the highest need for housing and they are the group which are most likely to have children. This group, and the 45 – 64 age group, are also disproportionately over represented on the housing register compared with their share of the Westminster population. Younger people are under represented.

Gender

A higher proportion of women (67%) are lead applicants on the housing register compared with their 49% share of the Westminster population.

Households with children

Households with children and lone parents are over represented on the housing register compared to their share of the Westminster population.

	Households with priority for housing 2016	Westminster Population (2011 Census)
Households with children	70%	19%
Lone parents	35%	6%

Disability

Less than 1% of households need a fully wheel chair adapted property and less than 1% also need a property where a wheelchair is needed outside the home but the person can manage in the home without one. Data is not available on all households that need these types of housing across Westminster. PANSI data 2015 indicates that 9% of people aged 18 – 64 are estimated to have a moderate or serious physical disability – but this data is not directly comparable.

1.5% of households on the housing register have been accepted due to a mental health issue but the number of households that include someone with a mental health problem is likely to be much higher. A national survey conducted by Shelter of 2,000 people in temporary accommodation¹, found that more than half said that they were suffering from depression and depression and other mental health problems were two of the most common health conditions reported. Currently 55% of all those in need of housing are in temporary accommodation. PANSI data 2015 shows that 16% of the 18 – 64 old Westminster population have a common mental health issue.

Sexual orientation and transgender/gender reassignment

The council does not record information about the sexual orientation of households with priority for housing. It is estimated that up to 10% of the Westminster population may be gay, lesbian, bi sexual or transgender (LGBT). Survey evidence published in 2009 (Mapping LGTB Westminster: Investigating the Needs and Experience of LGTB People in Westminster) suggests that the proportion of LGTB people living in private and social rented housing in Westminster is similar to that of residents more generally, and this tends to confirm that this can be used as an estimate for households with priority for housing.

Religion and belief

Data about the religion and belief of households in need of housing are not recorded, although it is possible to draw some conclusions from the ethnicity information in chart 1. It is likely that the diversity of ethnic origin this shows will be reflected in the range of religions and beliefs among those

¹ http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

in need of housing.

Income/non working households

Although income is not a protected characteristic for the purposes of the Equalities Act 2010, people in need of housing are likely to have lower incomes compared to the Westminster average. At least 92% of those in temporary accommodation currently receive housing benefit and this figure is likely to be higher as some claims are not yet in payment. Also c70% of households in social housing receive housing benefit. Across all tenures in Westminster, 23% of households receive housing benefit. The average income of households in need of housing is not known, but it is likely to be far less than the annual average household income in Westminster which was £43k² in 2013.

The profile of households in the Local Lettings Area

This cannot yet be fully analysed as the boundaries of the Local Letting Plan Area have not yet been set. An indicative example is below where data are available - this compares the profile of households with priority for housing in the Maida Vale Ward, with the overall demand (this example has been used as some infill development is planned in the Maida Vale ward).

Ethnicity

	Maida Vale Ward No	Maida Vale Ward %	All lists %
Asian	15	12%	14%
Black	22	18%	19%
Middle Eastern	35	28%	14%
Mixed	5	4%	3%
Chinese and Other	6	5%	9%
White	40	33%	25%
TOTAL	123		

(note the ethnic origin of some households is unknown)

Age

Age	Maida Vale Ward No	Maida Vale Ward %	All lists %
16-24	4	3%	5%
25-44	83	56%	54%
45-64	45	30%	31%
65-74	8	5%	6%
75 plus	9	6%	4%
Total	150		

² CACI Paycheck

Gender

	Maida vale Ward no	Maida Vale Ward %	All lists
Female	102	68%	67%
Male	48	32%	33%
Total	150		

Children/lone parents

	Maida Vale Ward No	Maida Vale Ward %	All lists
Households with children	113	75%	70%
Lone parents	49	32%	35%
Total	150		

Disability

Only 1 household in the Maida Vale Ward needs a wheelchair adapted property and there are no households registered that need a wheelchair outside the home but can manage inside it with one.

Overall the above comparisons show that in many areas the profile of households in the Maida Vale Ward are not significantly different from the overall list and the majority of households in this local area have protected characteristics.

Details of the lead person completing the screening/EIA

(i) **Full Name:** Cecily Herdman

(ii) **Position:** Principal Policy Officer

(iii) **Unit:** Policy, Performance

(iii) **Contact Details:**

cherdman@westminster 020 7641 2789

Date sent to Equalities@westminster.gov.uk

Version number and date of update

1

SECTION 1: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

1.1	Does the project, policy or proposal have the potential to disproportionately impact on any of the following groups? If so, is the impact positive or negative?				
		None	Positive	Negative	Not sure
	Disabled people	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Particular ethnic groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Men or women (include impacts due to pregnancy/ maternity)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People or particular sexual orientation/s	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People on low incomes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	People in particular age groups	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Groups with particular faiths and beliefs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?		<input type="checkbox"/>	<input type="checkbox"/>	
	If the answer is "negative" or "unclear" consider doing a full EIA				
1.2	What do you think that the overall NEGATIVE impact on groups and communities will be?				
	None/ Minimal <input checked="" type="checkbox"/> None or minimal impact would be where there is no negative impact identified, or where there will be no change to the services for any groups.		Significant <input type="checkbox"/> Significant impact would be where there is an impact identified that has substantial impact on any groups.		
	If the answer is "significant" consider doing a full EIA				

1.3	Using the screening information in questions 2.1 and 2.2, should a full EIA be carried out on the project, policy or proposal
	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
1.4	How have you come to this decision?
	<p>Although households with priority for housing in some defined local areas will benefit from the Infill Programme Local Lettings Plan – by having priority for housing sooner than they may do otherwise – there are not considered to be any negative equalities implications arising from this.</p> <p>The analysis above suggests that these groups will still be more likely to have protected characteristics and that their profile is broadly similar to those with priority for housing overall. There will of course always be variations and percentages can vary significantly when numbers are small.</p> <p>The policy is considered justified as without the support of local people, who will be affected by significant disruption arising from the Infill Programme, this much needed new supply of housing may not be developed.</p>

EQUALITY IMPACT ASSESSMENT

SECTION 2: BUILDING AN EVIDENCE BASE

2.1	Build up a picture of who uses/will use your service or facility and identify who are likely to be impacted by the proposal	
	<ul style="list-style-type: none"> <i>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</i> <i>A baseline of data is available here</i> 	
	How many people use the service currently? What is this as a % of Westminster's population?	
	Age	
	Disability	
	Gender	
	Race	

	Religion or belief	
	Sexual orientation	
2.2	Are there any equality groups that are overrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service. Information about Westminster's population is on the Equalities page on the WIRE.</i>	
	<i>If yes, provide details.</i>	
2.3	Are there any equality groups that are underrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</i>	
	<i>If yes, provide details.</i>	

SECTION 3: ASSESSING THE IMPACT

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

3.1	Consultation Information <i>This section should record the consultation activity undertaken in relation to this project, policy or proposal</i>
	<p><i>It is helpful to identify whether you have conducted any consultations for your proposal, in some cases a statutory consultation is required. If your proposal has not required a consultation, please highlight this here. Consultations will help you identify what the potential impact of your proposal might be.</i></p>
3.2	What might the potential impact on individuals or groups be? <i>Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups</i>
	<p><i>Using the evidence gathered in section 2 and any consultation activity highlighted in 3.1; explain what the potential impact of your proposal might be on the groups you have identified. You may wish to further supplement the evidence you have gathered in order to properly consider the impact. Please state when no impact has been identified.</i></p>

SECTION 4: REDUCING & MITIGATING IMPACT

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

4.1	Where you have identified an impact, what can be done to reduce or mitigate the impact? (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).																
	<p>Consider what actions can be put in place to remove or reduce your identified impact(s). Record all potential actions to show you have considered all options. Please note if no mitigating actions have been identified.</p> <table border="1" data-bbox="245 689 1517 1384"> <thead> <tr> <th data-bbox="245 689 735 835">Column A – Issues or barriers, things to take into account</th><th data-bbox="735 689 1517 835">Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).</th></tr> </thead> <tbody> <tr><td data-bbox="245 835 735 925"></td><td data-bbox="735 835 1517 925"></td></tr> <tr><td data-bbox="245 925 735 1014"></td><td data-bbox="735 925 1517 1014"></td></tr> <tr><td data-bbox="245 1014 735 1104"></td><td data-bbox="735 1014 1517 1104"></td></tr> <tr><td data-bbox="245 1104 735 1193"></td><td data-bbox="735 1104 1517 1193"></td></tr> <tr><td data-bbox="245 1193 735 1283"></td><td data-bbox="735 1193 1517 1283"></td></tr> <tr><td data-bbox="245 1283 735 1384"><i>Enter additional rows if require</i></td><td data-bbox="735 1283 1517 1384"></td></tr> </tbody> </table>			Column A – Issues or barriers, things to take into account	Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).											<i>Enter additional rows if require</i>	
Column A – Issues or barriers, things to take into account	Column B – what changes can be made to remove or reduce barriers or negative impacts (Remember to think about the Council as a whole, another service area may already be providing services which can help to deal with any negative impact).																
<i>Enter additional rows if require</i>																	
4.2	Now that you have considered the potential or actual effect on equality, what action are you taking?																
	<table border="1" data-bbox="245 1597 1517 2033"> <tbody> <tr> <td data-bbox="245 1597 357 1753"><input type="checkbox"/></td> <td data-bbox="357 1597 703 1753">1. No major change (no impacts identified)</td> <td data-bbox="703 1597 1517 1753">Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.</td> </tr> <tr> <td data-bbox="245 1753 357 1832"><input type="checkbox"/></td> <td data-bbox="357 1753 703 1832">2. Adjust the policy</td> <td data-bbox="703 1753 1517 1832">You will take steps to remove barriers or to better advance equality.</td> </tr> <tr> <td data-bbox="245 1832 357 1955"><input type="checkbox"/></td> <td data-bbox="357 1832 703 1955">3. Continue the policy (impacts identified)</td> <td data-bbox="703 1832 1517 1955">You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.</td> </tr> <tr> <td data-bbox="245 1955 357 2033"><input type="checkbox"/></td> <td data-bbox="357 1955 703 2033">4. Stop and remove the policy</td> <td data-bbox="703 1955 1517 2033">There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.</td> </tr> </tbody> </table>			<input type="checkbox"/>	1. No major change (no impacts identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.	<input type="checkbox"/>	2. Adjust the policy	You will take steps to remove barriers or to better advance equality.	<input type="checkbox"/>	3. Continue the policy (impacts identified)	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.	<input type="checkbox"/>	4. Stop and remove the policy	There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.		
<input type="checkbox"/>	1. No major change (no impacts identified)	Your analysis demonstrates that the policy is robust and the evidence shows no potential for discrimination and you have taken all appropriate steps to advance equality & foster good relations between groups.															
<input type="checkbox"/>	2. Adjust the policy	You will take steps to remove barriers or to better advance equality.															
<input type="checkbox"/>	3. Continue the policy (impacts identified)	You will adopt your proposal, despite any adverse effect provided you are satisfied that it does not unlawfully discriminate and it is justified.															
<input type="checkbox"/>	4. Stop and remove the policy	There are adverse effects that are not justified and cannot be mitigated. The policy is unlawfully discriminating.															

4.3	Please document the reasons for your decision

DRAFT

SECTION 5: ACTION PLAN

This section is for actions related any of the 9 protected characteristic: Age, Disability, Gender, Gender reassignment; Pregnancy & maternity, Race, Sexual Orientation or Religion/Belief

5.1	Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps. <i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i> NB. Add any additional rows, if required.						
	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Enter additional rows if required						

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE:

FULL NAME:

UNIT:

EMAIL & TELEPHONE EXT:

DATE (DD/MM/YYYY):

WHAT NEXT?

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by 2 September 2016.

All completed EIAs should be sent to: Equalities@westminster.gov.uk