



EQUALITY IMPACT ASSESSMENT

PLEASE ENSURE YOU READ THE GUIDANCE NOTES BEFORE COMPLETING THIS TEMPLATE

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.

SECTION 1:

Title	Rehousing Offer for tenants at Walden House
<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the policy/project/activity/strategy looking to achieve? • Who is it intended to benefit? Are any specific groups targeted by this decision? • What results are intended? 	<p>Background</p> <p>Walden House is a council leased block, which currently accommodates 38 Westminster City Council (WCC) secure tenants and 2 WCC Temporary Accommodation (TA) tenants (these are homeless households that have been offered temporary housing by the Council). Signed in 1921 for a period of 100 years, the council’s lease with the freeholder, Grosvenor Estate, was due to end in June 2021 however following discussions between the council and Grosvenor Estates, an extension has been granted to June 2023 provided that the council does everything it can to rehouse these tenants.</p> <p>As the situation is unusual and not covered by existing policies a bespoke rehousing offer has been developed, which takes into account: the number of secure tenants; the size of their households; the available supply of alternative council properties; and existing policies which deal with rehousing tenants where they need to move due to the councils regeneration programme or because their home needs major works.</p> <p>Following a comprehensive review of current these policies and options, the Council has put forward a rehousing package to Walden House residents.</p>

In developing this offer, the council has had to consider the needs of residents at Walden House, alongside those of other households in need of housing.

What this Equalities Impact Assessment (EIA) is evaluating:

This EIA assesses the council's **rehousing offer for tenants in Walden House**.

The offer covers:

- The support available for those affected
- How Walden House residents will be prioritised for rehousing
- The type of alternative housing that will be offered
- The rehousing process
- The approach to communications

Main aims of the offer are to:

- Provide a fair and transparent approach
- Provide the necessary support and advice through an unsettling and difficult process
- Compensate households for having to move at time which is not of their choosing .
- Prioritise Walden House residents for alternative rehousing as far as is possible, while also taking into account other demand on supply and Council objectives.

Key features of the offer:

General

- A dedicated rehousing officer to discuss peoples' needs and concerns
- Communication about what is happening

Financial

Financial compensation – Displacement payment of £6,300. *This is generally only offered where people need to move due to a council regeneration programme*

Full disturbance support to move i.e. arranging removals etc and full reimbursement where this is arranged by the tenant.

Rehousing and new homes

- High priority to move within the Allocation Scheme i.e. 450 points
With 450 points Walden House residents would still be one of the council's highest priority groups (Cash Incentive and Renewal Decant applicants are the only priority groups with more points).
- The opportunity to bid for a new home.

In addition, if a resident has not moved by the time there is 6 months left on the lease, WCC will make them one direct offer befitting their assessed housing needs.

- Alternative accommodation which meets the tenants' assessed household needs, rather than a property which matches their current home, so:
 - If a household is assessed as overcrowded, tenants will be able to bid and move to a larger property befitting their assessed bedroom need.
 - If a household is assessed as having a medical need, they will be offered suitable housing meeting their mobility category with the required adaptations.
 - If a household is assessed as requiring supported housing, they will be offered suitable housing meeting this housing need.
 - If a household is under occupied, tenants will only be able to bid and move to a property which matches their assessed bedroom need.

This is in accordance with both the Council's Allocation and Renewal decant policies. No Westminster Council policy currently allows tenants to move to a property larger than their assessed bedroom/medical need.

Location and local area commitments

- As Walden House residents will be able to bid for their new homes using the Council's Choice Based Lettings system, they will be able to bid for properties in areas of their own choosing from the available supply. However, this offer does not give Walden residents any guarantees that they will be able to remain in their current local area.
- This guarantee is only reserved to renewal decant tenants, who receive additional priority in the form of Local Connection point(s) and a right to return to a renewal estate, once redevelopment works are complete. The council has made the decision not to match the renewal offer to Walden House residents, as it is imperative for the success of the Council's regeneration programme that renewal decants continue to receive the highest priority. Their moves ultimately allow Westminster to fulfil its housing commitments to build more homes and increase the council's stock.
- This is particularly important and relevant to Walden House, as the neighbouring estate, Ebury Bridge, is one of the council's renewal estates, with decant status. Walden House is not part of a council renewal estate and with very low local supply available in the south area already, it is imperative that renewal applicants can successfully bid with no other competition, as this could impede the Council's ability to achieve vacant possession and proceed with the programme to schedule.

The offer of a Right of Return made to renewal decant tenants, will not be extended to Walden House tenants, as this would create a precedent for other schemes across Westminster that involve decants of

	<p>social units. The Council has no control over the timing of the Grosvenor scheme, and as the Ebury Bridge regeneration programme is being delivered in phases, there will unlikely be sufficient available social units to enable the residents of Walden House to be guaranteed a commitment to be rehoused on Ebury in the time required.</p>
<p>Details of the lead person completing the screening/ EIA</p>	<p>(i) Full Name: Sarah Crampton</p> <p>(ii) Position: Relocations Manager</p> <p>(iii) Unit: Growth, Planning and Housing</p> <p>(iii) Contact Details: scrampton@westminster.gov.uk</p>
<p>Date sent to Equalities@westminster.gov.uk</p>	
<p>Version number and date of update</p>	<p>V1 – 4th March 2019</p>
<p><i>You will need to update your EIA as you move through the decision-making process. Record the version number here and the date you updated the EIA. Keep all versions so you have evidence that you have considered equality throughout the process. However <u>only</u> the most updated version will be saved in the Equalities SharePoint folder.</i></p>	

ACTION 2: Do you need to complete a full Equality Impact Assessment (EIA)?

Not all proposals will require a full EIA, the assessment of impacts should be proportionate to the nature of the project/policy in question and its likely impact. To decide on the level of detail of the assessment required consider the potential impact on persons with protected characteristics.

<p>2.1</p>	<p>Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal</p> <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>Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal</i> 																	
<p>How many people use the service currently? What is this as a % of Westminster's population?</p>	<p>At the time of writing, the offer will only apply to the 38 secure tenants in Walden House. The data below on Walden tenants is not up to date but gives an indication of their profile. Given this the profile of all council tenants is also included in the tables below. It is anticipated that more up to date information will be recorded when individual discussions with residents start. dedicated Relocations Officers.</p> <p>Walden tenants make up less than 1% of the Westminster population.</p> <p>The profile of the tenants is estimated in the following tables, using "modelled" data from the council's 2017 City Survey. (The council does not hold specific data on the profile of its tenants). In this survey, a sample of residents across Westminster were interviewed, and this data has been used to make assumptions about <i>all</i> tenants.</p>																	
<p>Gender</p>	<table border="1" data-bbox="398 991 1834 1273"> <thead> <tr> <th></th> <th colspan="2">City Survey 2017</th> <th rowspan="2">Walden house tenants</th> </tr> <tr> <th>GENDER</th> <th>All Respondents %</th> <th>Council tenants %</th> </tr> </thead> <tbody> <tr> <td>Male</td> <td>52%</td> <td>39%</td> <td>32 %</td> </tr> <tr> <td>Female</td> <td>48%</td> <td>61%</td> <td>68 %</td> </tr> </tbody> </table> <p>The table shows an over representation of females at Walden House, when compared to the data for the Westminster population and council tenants.</p>				City Survey 2017		Walden house tenants	GENDER	All Respondents %	Council tenants %	Male	52%	39%	32 %	Female	48%	61%	68 %
	City Survey 2017		Walden house tenants															
GENDER	All Respondents %	Council tenants %																
Male	52%	39%	32 %															
Female	48%	61%	68 %															

Race	<table border="1" data-bbox="405 180 1834 635"> <thead> <tr> <th data-bbox="405 180 573 256"></th> <th colspan="2" data-bbox="573 180 1104 256">City Survey 2017</th> <th colspan="2" data-bbox="1104 180 1834 256">Walden house tenants</th> </tr> <tr> <th data-bbox="405 256 573 363">ETHNICITY</th> <th data-bbox="573 256 763 363">All Respondents %</th> <th data-bbox="763 256 1104 363">Council tenants %</th> <th colspan="2"></th> </tr> </thead> <tbody> <tr> <td data-bbox="405 363 573 411">White</td> <td data-bbox="573 363 763 411">68%</td> <td data-bbox="763 363 1104 411">52%</td> <td colspan="2" data-bbox="1104 363 1834 411">33.2%</td> </tr> <tr> <td data-bbox="405 411 573 459">Black</td> <td data-bbox="573 411 763 459">9%</td> <td data-bbox="763 411 1104 459">13%</td> <td colspan="2" data-bbox="1104 411 1834 459">18%</td> </tr> <tr> <td data-bbox="405 459 573 507">Asian</td> <td data-bbox="573 459 763 507">13%</td> <td data-bbox="763 459 1104 507">17%</td> <td colspan="2" data-bbox="1104 459 1834 507">26%</td> </tr> <tr> <td data-bbox="405 507 573 555">Mixed</td> <td data-bbox="573 507 763 555">4%</td> <td data-bbox="763 507 1104 555">9%</td> <td colspan="2" data-bbox="1104 507 1834 555">2.6%</td> </tr> <tr> <td data-bbox="405 555 573 603">Arab</td> <td data-bbox="573 555 763 603">5%</td> <td data-bbox="763 555 1104 603">3%</td> <td colspan="2" data-bbox="1104 555 1834 603">2.6%</td> </tr> <tr> <td data-bbox="405 603 573 651">Other</td> <td data-bbox="573 603 763 651">1%</td> <td data-bbox="763 603 1104 651">2%</td> <td colspan="2" data-bbox="1104 603 1834 651">2.6%</td> </tr> </tbody> </table> <p data-bbox="398 676 1848 743">While the largest ethnicity group at Walden House is White, in comparison to the overall Westminster and Council tenant population, residents in Walden House there is a significantly higher proportion of Black and Asian households.</p>					City Survey 2017		Walden house tenants		ETHNICITY	All Respondents %	Council tenants %			White	68%	52%	33.2%		Black	9%	13%	18%		Asian	13%	17%	26%		Mixed	4%	9%	2.6%		Arab	5%	3%	2.6%		Other	1%	2%	2.6%	
	City Survey 2017		Walden house tenants																																									
ETHNICITY	All Respondents %	Council tenants %																																										
White	68%	52%	33.2%																																									
Black	9%	13%	18%																																									
Asian	13%	17%	26%																																									
Mixed	4%	9%	2.6%																																									
Arab	5%	3%	2.6%																																									
Other	1%	2%	2.6%																																									
Disability	A Housing Needs assessment exercise is required to fully understand the needs of the residents in Walden House tenants, which can later be compared to the wider Westminster City population and Council tenant data.																																											
Sexual orientation	The council does not record information about the sexual orientation in its City Survey. Similarly there is no reliable estimate of the number of persons proposing to undergo, is undergoing or has undergone gender reassignment. It is estimated, that up to 10% of the Westminster population may be gay, lesbian, bi sexual or transgender (LGBT) ¹ . This can be compared with the 2016 Annual Population Survey for the UK which found that 2% of the population identified themselves as lesbian, gay, bi sexual or other.																																											
Age	<table border="1" data-bbox="405 1145 1854 1356"> <thead> <tr> <th data-bbox="405 1145 636 1222">AGE</th> <th data-bbox="636 1145 1104 1222">Council tenants %</th> <th data-bbox="1104 1145 1473 1222">Westminster population%</th> <th data-bbox="1473 1145 1854 1222">Walden house tenants %</th> </tr> </thead> <tbody> <tr> <td data-bbox="405 1222 636 1270">16-30</td> <td data-bbox="636 1222 1104 1270">7%</td> <td data-bbox="1104 1222 1473 1270">13%</td> <td data-bbox="1473 1222 1854 1270">0%</td> </tr> <tr> <td data-bbox="405 1270 636 1318">31-50</td> <td data-bbox="636 1270 1104 1318">36%</td> <td data-bbox="1104 1270 1473 1318">16%</td> <td data-bbox="1473 1270 1854 1318">26%</td> </tr> <tr> <td data-bbox="405 1318 636 1356">51-70</td> <td data-bbox="636 1318 1104 1356">34%</td> <td data-bbox="1104 1318 1473 1356">9%</td> <td data-bbox="1473 1318 1854 1356">54%</td> </tr> </tbody> </table>				AGE	Council tenants %	Westminster population%	Walden house tenants %	16-30	7%	13%	0%	31-50	36%	16%	26%	51-70	34%	9%	54%																								
AGE	Council tenants %	Westminster population%	Walden house tenants %																																									
16-30	7%	13%	0%																																									
31-50	36%	16%	26%																																									
51-70	34%	9%	54%																																									

¹ 5

71-80	14%	3%	14%
81+	9%	2%	0.06%

**Source: 2011 Census

The local data for Walden House indicates its residents are of an older age in comparison to the Westminster and council tenant average.

Pregnancy and maternity/children in household

	City Survey 2017	Census 2011 – dependent children only	Walden house tenants
CHILDREN IN HOUSEHOLD	All Respondents %	Westminster population	
Yes	31%	19%	36.8%
No	69%	81%	63.2%
Pregnant		1,990	Data not currently available

The local data for Walden House indicates its residents have a higher proportion of children in their household when compared to the Westminster and council tenant average.

Religion or belief

	City Survey 2017		Walden house tenants
RELIGION AND BELIEF	All Respondents %	Council tenants %	
Christian	Data not available		Data not currently available
Buddhist			

Hindu		
Jewish		
Muslim		
Sikh		
Other		
None		
None stated		

The Housing Needs assessment will provide a more comprehensive picture of each of the Walden House tenant's religious beliefs which can later be compared to the wider Westminster population and council tenant data.

Economic activity

	City Survey 2017		Walden House Benefit claimants
WORKING (Working age population)	All Respondents %	Council tenant %	
Full time	53%	Data not currently available	Data not currently available
Working part time/apprentices	10%		
Not working	37%		

The Housing Needs assessment will provide a more comprehensive picture of each of the Walden House tenant's financial position, which can later be compared to the wider Westminster population.

<p>2.2 Are there any groups with protected characteristic 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.</i></p>	<p><i>If yes, provide details.</i></p> <p>Overall Walden tenants compared with the Westminster tenants, are more likely to be/have:</p> <ul style="list-style-type: none"> ○ Older ○ Non-White (From a Black and Asian ethnic background) ○ Female
<p>2.3 Are there any groups with protected characteristics 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></p>	<p><i>If yes, provide details.</i></p> <p>Overall council less likely compared with the overall Westminster population to be:</p> <ul style="list-style-type: none"> ○ White ○ Male ○ Younger <p>The diversity of the block is quite significant. Nonetheless the critical factor is the need to move these tenants and to work with each tenant and their family to ensure that the relocation of residents is consistent and fair and not influenced by someone's protected characteristic.</p> <p>It is critical to ensure that these tenants have positive experiences from their move irrespective of their race, age and gender. Clearly there is likely to be some groups that will have a higher likelihood of negative impacts particularly those who are older, with lower socio-economic status and those with health conditions and disability. Nonetheless these as discrete protected characteristics may have a high racial component by dint of the large BAME profile of the block. However, these potential negative impacts are not because of these people's racial make-up.</p>
<p>2.4</p>	

Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?

		Positive	Negative	Detail	None, why?
Gender		Overcrowded tenants will be offered larger housing which meets their housing need, which could reduce strain for single parents, and allow them to move to a part of the borough where they are better supported (Where family/friends live/ closer to schools or services).	Single parent households may struggle to cope with a requirement to move home less well than two parent households. Moving home involves costs, which whilst are reimbursed, do involve organising removals, connections and disconnections, forwarding mail, and furnishing a new home. It may also involve having to find a new doctor, dentist and school for any children May have to move away from support networks.	Single parent households are more likely to be headed by a woman, and therefore this offer may have a greater impact on women, than men	
Race or ethnicity (including refugees, asylum seekers, migrants and					No differential impact. All tenants of different racial backgrounds are likely to be

	gypsies and travellers)					equally affected by the proposals
	Disability		<p>During the HNA interview it may identify needs/support which are not offered in their current property/ area. The move may allow disabled tenants to more suitable housing based on their need or move to a area within the borough where they are better supported (Where family/friends live/ closer to schools or services).</p>	<p>Rehousing is very disruptive to households with a disability. Homes may already have been adapted to their needs, and there may be considerable changes to the layout of the home, kitchen bathroom, entrance, parking arrangements and the environment to suit their needs.</p>	<p>The household may have developed local support links with family, friends and neighbours, which have the potential to be broken by a forced move.</p>	
	Sexual orientation/s					No impact currently identified as insufficient data available.
	Marriage or civil partnership					No impact differential impact. All tenants whether married, in a civil

					partnership or otherwise are likely to be equally affected.
Age		Overcrowded households will be offered larger homes i.e. those with children which may reduce stress and issues for older residents. Support will be offered by the dedicated Relocations officer to ensure older tenants are able to bid or be added to the auto bid system.	Moving is very disruptive to older people. Facing the disruption of a move can be particularly distressing in older age. More likely to be under occupying – so will be offered smaller homes	Older people may be more reliant on neighbours that they know community facilities, and proximity to families that provide care and support.	
Gender reassignment					No impact currently identified as insufficient data available
Pregnancy/ maternity		The move may allow pregnant tenants to more suitable housing based on their need	Rehousing is very disruptive, and likely to be difficult for households including a pregnant woman.		

		or move to a area within the borough where they are better supported (Where family/friends live/ closer to schools or services).			
	Religion				No differential impact. All tenants of different religious backgrounds are likely to be equally affected.
	People on low incomes	Under occupied households will have the opportunity to now bid for smaller, less expensive properties befitting the housing need. Rent, heating and council tax bills are more likely to be less expensive which will particularly help families	Moving is expensive and there can always be unforeseen costs		

who are currently struggling to manage their rent. The Council is committed to cover all disturbance costs and will award each tenant a Displacement payment of £6,300 when they move, which could help tenants on low incomes.

If any of the answers to the questions above is, “negative” or “unclear” you will need to undertake a detailed impact assessment.

2.5	Based on your responses, should a full, detailed EIA be carried out on the project, policy or proposal
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2.6	Provide brief reasons on how have you come to this decision?
	<p>As there are potentially both positive <i>and</i> negative impacts.</p> <p>As set out further in Section 3, the design of the Policy seeks to help mitigate these negative consequences.</p>

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. Using the evidence gathered in section 2, 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 using the table below in order to properly consider the impact.

3A General principles

Positive impacts – which might apply to Walden residents

1. Disabled people who cannot sustain independent living in their current homes will be assessed and rehoused to new homes meeting their housing needs and any adaptations will be reinstated in the new home by the council.
2. Walden tenant will be awarded 450 points, high priority and access to move to an area of their choosing.
3. Each Walden secure tenant will have access to a dedicated Relocations Officer to discuss their move and this will be done in a way suited to their needs
4. The offer will be communicated in an accessible way and there will be a named contact
5. Practical help and support will be available for tenants as it is needed – for example this might include detailed support for older and vulnerable tenants that have not moved
6. A single disturbance payment of £6,300 will be awarded to each secure tenant/ join tenant in recognition of the disturbance relating to the move.

Negative impacts – these might impact on Walden tenants

1. Settled residents, who enjoy their current location and have no wish to move may feel the offer is not generous enough and request further commitments which Renewal decant applicants are offered.

Many of the potential impacts will become visible once residents are in detailed discussions with the Relocations team about their own personal circumstances including financial, physical and social as they explore the options available to them.

*The negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population. It is assessed as **medium** if the impact would have a greater impact on the group than it would do the overall population, or the group is over represented amongst tenants. The impact is assessed as **high** if the impact would have a greater impact on the group than it would do the overall population to the extent that it might result in discrimination and the group is over represented amongst tenants

Protected Group	Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts	
	Eliminate discrimination	Advance equality	Good relations					
Section 3A: General principles (See above for more about positive and negative impacts)								
Gender	Men	X	X	x	1 – 2 (Low)		<ul style="list-style-type: none"> • Appoint a Relocations Officer to the case to make one to one advice available to answer detailed questions. • The Relocations Officer will identify individuals with specific support needs through the housing need assessment process and will engage with the suitable services to support the affected parties. • This officer will receive Equality training/briefings in order for them to lead on the discussions with residents • Communicate detailed processes/information through the Relocations team. 	<ul style="list-style-type: none"> • There is a renewal decant offer to regeneration tenants to remain in the local area and this policy is also being updated.

							<ul style="list-style-type: none"> • Considering appointing an independent Advice officer to assist with decisions. • Produce simple summary document which outlines the core elements of the offer. • 	
	Women	X	X	x	1 – 2 (Low)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
Race	White	X	X	x	1 - 2 (Medium)		<p>As above, plus: The Council is aware that English will not be the first language for all residing tenants, and will ensure the rehousing offer will be communicated to tenants in an accessible way which may require interpreting and translating information</p>	<ul style="list-style-type: none"> •
	Mixed/Multiple ethnic groups	X	X	x	1 - 2 (Low)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
	Asian/Asian British	X	X	x	1 – 2 (Low)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
	Arab	x	x	x	1 – 2 (Low)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
	Black/African/Caribbean/Black British	X	X	x	1 – 2 (Low)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
	Gypsies / travellers	N/A	N/A		N/A			
	Other ethnic group	X	X	x	1 – 2 (Low)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
Disability	Physical	X	X	x	1 – 2 (Medium)		<ul style="list-style-type: none"> • As above, plus tailored one to one sessions • Operationally it would make sense to have early engagement with any residents that have a 	<ul style="list-style-type: none"> • As above

							<p>stated disability. This is particularly important if the households who identified sensory impairments within their families, and when considering the challenges associated with moving disabled families</p> <ul style="list-style-type: none"> • Referrals when appropriate will be made to Westminster's Medical OT / social services to assess the disability needs of the resident to mitigate negative impacts. • Any identified serious health conditions should be prioritised and strongly supported. Progressive conditions may also need to be addressed 	
	Sensory	X	X	x	1-2 (Medium)		<ul style="list-style-type: none"> • As above plus tailored one to one sessions 	<ul style="list-style-type: none"> • As above
	Learning Difficulties	X	X	x	1-2 (Medium)		<ul style="list-style-type: none"> • As above plus tailored one to one sessions. • People with learning difficulties, subject to the intensity of their condition, will also be 	<ul style="list-style-type: none"> • As above

							affected by the move process and may need separate/ specialised forms of communication and engagement to enable their understanding of the reality of their situation	
	Learning Disabilities	X	X	x	1-2 (Medium)		<ul style="list-style-type: none"> As above plus tailored one to one sessions 	<ul style="list-style-type: none"> As above
	Mental Health	X	X	x	1-2 (Medium)		<ul style="list-style-type: none"> As above plus tailored one to one sessions 	<ul style="list-style-type: none"> As above
Sexual Orientation	Lesbian, gay men, bisexual	X	X	x	1 (Low)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
Age	Older people (50+)	X	X	x	1 - 2 (Medium)		<ul style="list-style-type: none"> The offer will be communicated to tenants in an accessible way and the Relocations Officer and/or consideration will be given to the provision of additional specialist as required to work with older tenants to help them with their move. 	<ul style="list-style-type: none"> As above
	Younger people (16 - 25)	X	X	x	1 – 2 (Low)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Children	x	x	x	1 – 2 (Low)		As above	As above
Gender Reassignment		X	X	x	N/A	N/A	<ul style="list-style-type: none"> This data is not currently recorded by the Council and will be collected and reviewed during the Housing Need Assessment interviews. 	
Impact due to pregnancy/maternity		X	X	x	1 (Low)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above

Groups with particular faiths and beliefs	x	X	x	1 (Low)		<ul style="list-style-type: none"> This data is not currently recorded by the Council and will be collected and reviewed during the Housing Need Assessment interviews.
People on low incomes	x	x	x	1 - 2 (Medium)		<p>As above, plus:</p> <p>The move will have impacts on residents, which might incur greater costs (e.g increased rents/ service charges) and charges linked to the mov. This could become a burden for those residents unable to afford the associated costs.</p> <p>As part of the 'relocation offer' package to address affordability issues the council will agree to cover all reasonable disturbances charges linked to the move. The Council will need carefully to monitor how the move affects older tenants with possible reduced financial capacity</p> <ul style="list-style-type: none"> As above

Section 3B: Offer of a new home based on housing need

Positive impacts

7. Moving to smaller property befitting the household will tenants the opportunity to move potentially to a home with cheaper rent, service charge and bills.
8. Each Walden tenant will have access to advice from the dedicated Relocations Officer to discuss this option and this will be done in a way suited to their needs. Practical help and support will be available for tenants as it is needed.
9. Overcrowded households will be offered larger accommodation in accordance with the bedroom need.

Negative impacts

1. Households may feel aggrieved that they will have less space and/or bedrooms in comparison to their current home.
2. Adult siblings of the same gender who currently have their own bedrooms would now need to share a room in accordance to the Allocation policy's bedroom standard.
3. As households are not releasing larger homes back to the Council they will not receive the cash incentive payment for each bedroom released.

Many of the potential impacts will become visible once residents are in detailed discussions with the Relocations team about their own personal circumstances including financial, physical and social as they explore the options available to them.

*The negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population. It is assessed as **medium** if the impact would have a greater impact on the group than it would do the overall population or the group is over represented amongst tenants. The impact is assessed as **high** if the impact would have a greater impact on the group than it would do the overall population to the extent that it might result in discrimination and the group is over represented amongst tenants

Protected Group	Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
	Eliminate discrimination	Advance equality	Good relations				
Section 3B: Moving to a smaller property (See above for more about positive and negative impacts)							
Gender	Men	X	X	x	Low (1 – 2)	<ul style="list-style-type: none"> • Clear communication via the Relocations Officer and written correspondence will be shared with the tenant 	<ul style="list-style-type: none"> • Depending on the property the family move to rent and Council Tax might be higher in the new properties although

							to explain the reason why they may have to move to a smaller property. Reference will be made to the Council's Allocation policy and the bedroom standard.	fuel bills should be lower) <ul style="list-style-type: none"> There is a similar offer to tenants to remain in the local area and this policy is also being updated
	Women	X	X	x	Low (1- 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
Race	White	X	X	x	Medium (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Mixed/Multiple ethnic groups	X	X	x	Low (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Asian/Asian British	X	X	x	Medium (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Arab	x	x	x	Medium (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Black/African/Caribbean/ Black British	X	X	x	Medium (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Gypsies / travellers	N/A	N/A		N/A		N/A	N/A
	Other ethnic group	X	X	x	Low (1 – 5)		<ul style="list-style-type: none"> As above 	
Disability	Physical	X	X	x	Low (1,2,4 Medium (3,5)		<ul style="list-style-type: none"> As above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above
	Sensory	X	X	x	Low (1,2,4)		<ul style="list-style-type: none"> As above plus: 	<ul style="list-style-type: none"> As above

					Medium (3,5)		<ul style="list-style-type: none"> Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	
	Learning Difficulties	X	X	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> As above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above
	Learning Disabilities	X	X	x	Low (1,2,4,5) Medium (3,5)		<ul style="list-style-type: none"> As above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above
	Mental Health	X	X	x	Low (1,2,4,5) Medium (3,5)		<ul style="list-style-type: none"> As above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above
Sexual Orientation	Lesbian, gay men, bisexual	X	X	x	Low (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above

Age	Older people (50+)	X	X	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> As above plus: Given the analysis from the tenant profile in Walden House tells us there are a high number of older households, it is essential that the Council adopts an application of flexibility to the criteria on case by case basis. Referrals will be made to Westminster's OT/Social services support for any adaptations to new homes for older people particularly those with a disability / health conditions. 	<ul style="list-style-type: none"> As above
	Younger people (16 - 25)	X	X	x	Low (1-5)		<ul style="list-style-type: none"> As above 	
	Children	X	X	X	N/A		N/A	
Gender Reassignment		X	X	x	Low (1-5)		<ul style="list-style-type: none"> As above 	
Impact due to pregnancy/maternity		X	X	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> As above plus: 	

Groups with particular faiths and beliefs	x	X	x	Medium (1-5) Given Ebury and Church Street populations		<ul style="list-style-type: none"> As above 	
People on low incomes	x	x	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> As above plus make financial advice available 	

Section 3C: No guarantees to stay in the local area

Positive impacts

1. School uniforms will be reimbursed by the Council if a new school is required due to the move.
2. Any disabled adaptations will be reinstated in the new accommodation
3. Once there is 6 months left on the lease, if tenants remain in the block the Council will make them one direct offer which will take into consideration their housing needs, including local connections to the area.

Negative impacts

1. Residents are highly likely to lose near neighbours in the move and may feel concerns about this and fear the perceived need to have to start over again.

2. Some residents may lose access to immediate local services in the move to a new area, which may have negative impacts on residents reliant on a local/ care network.

Many of the potential impacts will become visible once residents are in detailed discussions with the Relocations team about their own personal circumstances including financial, physical and social as they explore the options available to them.

*The negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population. It is assessed as **medium** if the impact would have a greater impact on the group than it would do the overall population or the group is over represented amongst tenants. The impact is assessed as **high** if the impact would have a greater impact on the group than it would do the overall population to the extent that it might result in discrimination and the group is over represented amongst tenants

Protected Group	Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
	Eliminate discrimination	Advance equality	Good relations				
Section 3C: Moving from the local area (See above for more about positive and negative impacts)							
Gender	Men	X	X		Low (1 - 2)		<ul style="list-style-type: none"> • Clear communication and support via the Relocations Officer and written correspondence will be shared with the tenant to explain why the Council is unable to guarantee they can remain in the area. •

	Women	X	X		Low (1) Medium (2)		<ul style="list-style-type: none"> As above 	
Race	White	X	X		Medium (1 - 2)		<ul style="list-style-type: none"> As above 	
	Mixed/Multiple ethnic groups	X	X		Low (1 - 2)		<ul style="list-style-type: none"> As above 	
	Asian/Asian British	X	X		Low (1 - 2)		<ul style="list-style-type: none"> As above 	
	Arab	x	x		Low (1 - 2)		<ul style="list-style-type: none"> As above 	
	Black/African/Caribbean/Black British	X	X		Low (1 - 2)		<ul style="list-style-type: none"> As above 	
	Gypsies / travellers	N/A	N/A		N/A		N/A	
	Other ethnic group	X	X		Low (1 - 2)		<ul style="list-style-type: none"> As above 	
Disability	Physical	X	X		Medium (1-2)		<ul style="list-style-type: none"> As above plus: The Relocations Officer will work closely with them on the location of their new home to ensure any vulnerable resident is moved to a location where they will receive sufficient support and is moved to a property which is adapted to meet their housing needs. 	
	Sensory	X	X		Low (1)		<ul style="list-style-type: none"> As above plus: The Relocations Officer will work closely with them on the location of their new home 	

							<ul style="list-style-type: none"> The Relocations Officer will support households who need care support which disproportionately is more likely to impact disabled and those with health conditions 	
	Learning Difficulties	X	X		Low (1)		<ul style="list-style-type: none"> As above plus: The Relocations Officer will work closely with them on the location of their new home 	
	Learning Disabilities	X	X		Low (1)		<ul style="list-style-type: none"> As above plus: The Relocations Officer will work closely with them on the location of their new home 	
	Mental Health	X	X		Low (1)		<ul style="list-style-type: none"> As above plus: The Relocations Officer will work closely with them on the location of their new home 	
Sexual Orientation	Lesbian, gay men, bisexual	X	X		Low (1 - 2)		<ul style="list-style-type: none"> As above. 	
Age	Older people (50+)	X	X		Medium (2)		<ul style="list-style-type: none"> As above plus: The dedicated Relocations Officer will work closely with them on the location of their new home. 	

							<ul style="list-style-type: none"> The Relocations Officer will support households who need care support which disproportionately is more likely to impact on older people. 	
	Younger people (16 - 25)	X	X		Low (1)		<ul style="list-style-type: none"> As above 	
	Children	x	x		Medium (1-2)		<ul style="list-style-type: none"> The Relocations Officer will support households with strong local connections to the area – e.g schools. The Relocations Officer will work closely with them on the location of their new home. 	
Gender Reassignment		X	X		Low (1)		<ul style="list-style-type: none"> As above 	
Impact due to pregnancy/maternity		X	X		Low (1)		<ul style="list-style-type: none"> As above plus: The Relocations Officer will work closely with them on the location of their new home 	
Groups with particular faiths and beliefs		x	X		Medium (1 – 2)		<ul style="list-style-type: none"> As above 	
People on low incomes					Medium (1 – 2)		<ul style="list-style-type: none"> As above 	

SECTION 4: ACTION PLAN

4.1 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.

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.

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
Review the offer when it has been in operation and has been implemented for one year	All	To understand how it impacts on different groups	Internal	Head of Policy	Summer 2019 (estimated)	
Collect equalities data on affected Walden tenants	All	To better evaluate the impact of the offer on different groups	Internal	Director of Regeneration	Ongoing	
<i>Enter additional rows if required</i>						

Conclusion

This EqIA identifies that there are impacts both positive and negative of the rehousing offer on Walden House residents, and the offer will have a disproportionate impact on certain groups. The groups with protected characteristics, where there is a disproportionate impact, are households containing older people, female headed single parent households, and households containing someone with a disability or households containing a pregnant woman.

The positive impacts are that overcrowded families will be moved to more suitable accommodation, more quickly than they would have been and individuals with disabilities will be fully assessed and offered housing befitting their medical needs. However, the immediate negative impact for all will be a period of severe disruption, which households have to move, and arrange to move all their household goods, and make new arrangements to access local services. While the council has taken steps to mitigate the negative impacts, including a compensation payment, they will not be eradicated in full, as the core product offer does not include guarantees they may remain their local area.

While the Council recognises that like Ebury decants, certain Walden residents will have strong local links to the area, if the council were to mitigate this impact in full, this could significantly impact the decant progress, creating additional competition in an already diminished housing supply. This subsequently would impact on the Council's ability to implement the housing renewal schemes in accordance with Westminster's overarching housing strategy. This would then have a detrimental impact overall, and therefore restrict the council's ability to deliver its aims of improving housing conditions, increasing the supply of affordable housing and improving neighbourhoods.

Although the move is highly disruptive, due to the lease expiry it cannot be avoided and is wholly out of the Council's control. Westminster City Council plans to take mitigating action, so that vulnerable households who are disproportionately affected by the disruption of the move are supported throughout the process, and benefit from the possibility of moving to a new home which may better serve their housing needs. The data available for this EqIA is limited. The council is in the process of collecting more relevant data in respect of its tenants. However, the offer sets out general principles which may be adapted for individuals moving.

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER

SIGNATURE:

FULL NAME:Tom McGregor, Director of Housing and Regeneration.....

UNIT:Growth, Planning and Housing

EMAIL & TELEPHONE EXT: ...tmcgregor@westminster.gov.uk. 020 7641 4081.....

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 (insert date).

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