



‘You will not get far if you perceive the duty to be over burdensome or take a mechanistic approach....there will be progress if the duty is seen as a way of fundamentally changing the core values and culture of the organisation.....we need and outcome-oriented approach’ – CRE Chair 2001

## Equality Impact Assessment: Stage 1: Initial Screening Form for Policies or Functions (including new & revised)

### A: Summary Details

Directorate: Community and Children's Services

Section: Housing

Person responsible for the assessment: Simon Cribbens

Contact details: simon.cribbens@cityoflondon.gov.uk

Names of other people participating in review:

Name of Policy to be assessed: Tenancy Strategy

Is this a new or revised policy: New

Date policy scheduled for Committee (if relevant): 30 January 2014

### B: Preparation

*It is important to consider all available information that could help determine whether the policy could have any actual or **potential** adverse impact. Please attach examples of available monitoring information, research and consultation reports.*

1. Do you have monitoring data available on the number of people (with protected characteristics\*) who are using or are potentially impacted upon by your policy?

Some monitoring data is available for households on the City of London's housing waiting list and for households housed in City homes, but this does not record or report all protected characteristics. Some of these are reflected in broader Census data.

The number of people usually resident in the City is small, around 7,400. In addition, there are around 1400 people who have a second home in the City but live elsewhere. There are 4,390 households and large numbers of people of working age. The City has proportionately more people aged between 25 and 69 than Greater London. Conversely there are fewer young people. Only 10% of households have children compared to around 30% for London and the rest of the country. Average household size is small and many people (56%) live alone.

Census data indicates that people whose day to day activities are limited by ill-health or disability are over represented on the City's social housing estates.

| Zone                        | Population whose day-to-day activities limited a lot by a health problem or disability |
|-----------------------------|--|
| Golden Lane                 | 7.3%   |
| Mansell Street Estate       | 9.2%   |
| Middlesex Street Estate     | 8.7%   |
| <b>City of London TOTAL</b> | <b>4.4%</b>  |
| ENGLAND AND WALES           | 8.5%   |
| LONDON                      | 6.7%   |

The population is predominantly white. The second largest ethnic group is Asian. This group which includes Indian, Bangladeshi and Chinese populations has grown over the past decade. The City has a relatively small Black population, less than London and England and Wales.

The Tenancy Strategy sets out an approach for all social landlords operating in the City. Data relating to their housing applicants is only available to the City in limited circumstances (where the City is nominating a household) and does not contain protected characteristic data.

2. If monitoring has NOT been undertaken, will it be done in the future or do you have access to relevant monitoring data for this area? If not, specify the arrangement you intend to make; if not please give a reason for your decision.

Improvements are being made to the housing IT system and the developing “family profiling project” to provide more detailed information and allow for monitoring.

More detailed and systematic data collection will be put in place during 2014 to improve monitoring and transparency. Data on allocations and the Housing Waiting List will be published in line with government requirements.

3. Please list any consultations that you may have had and/or local/national consultations, research or practical guidance that will assist you in completing this EqIA.

Localism Act Impact Assessment; peer borough Tenancy Strategy EqIAs

### **C: Your Policy or Function**

1. What is the main purpose of the policy or function?

The Localism Act 2011 placed a new duty on local housing authorities, including the Common Council of the City of London Corporation, to prepare and publish a Tenancy Strategy. The purpose of this strategy is to set out the matters to which the City Corporation and other social housing providers in the City are to have regard in formulating their policies on tenancies, including:

- the types of tenancy they grant
- the circumstances in which they will grant a tenancy of a particular type
- the length of any fixed-term tenancy
- the circumstances in which they will grant another tenancy when a fixed-term tenancy expires, and
- the local approach to rent levels and the position with regard to the new Affordable Rent product.

2 Are there any other objectives of the policy or function, if so what are they?

The wider objectives of government are to provide local authorities with the flexibility to determine how the social housing stock is used. This aims to let authorities balance the opportunity to increase housing mobility among social tenants with the need to create sustainable communities.

3 Do any written procedures exist to enable delivery of this policy or function?

Yes. Housing allocations is subject to existing procedures and the City's Housing Allocations Policy. A Tenancy Policy will be developed to reflect this strategy once adopted by the City.

4 Are there elements of common practice in the service area or function that are **not** clearly defined within the written procedures?

No.

5 Who are the main stakeholders of the policy?

Tenants of social housing owned by City of London, and of other social landlords within the City's boundaries; housing waiting list applicants; and homeless applicants.

6 Is the policy associated with any other Corporation policy (s)?

This strategy works alongside the City's Housing Allocations Policy, Housing Strategy and Homelessness Strategy, and once adopted will be supported by a Tenancy Policy that will govern delivery.

7 Are there any areas of the service/policy that are governed by discretionary powers? If so, is there clear guidance as to how to exercise these?

The Strategy sets out that fixed term tenancies and/or affordable rents may be used by the City in certain limited circumstances. Such circumstances will be determined by the housing product offered (for instance a specific short term training accommodation scheme) and not by the household type. It is the expectation of the City that lifetime tenancies will be the predominant offer. Exceptions from this approach will not be a matter of individual discretion, but formally agreed.

8 Is the responsibility for the proposed policy or function shared with another department or authority or organisation? If so, what responsibility, and which bodies?

Yes. The strategy sets out an approach for all social landlords operating within the City's boundaries. This Strategy provides them with guidance to City's preferred approach with which they should have regard, but are not compelled to comply. However, these organisations are regulated and required to comply with equalities legislation and other housing law

## D: The Impact

Assess the potential impact that the policy could have on people who share the protected characteristics. The potential impact could be negative, positive or neutral. If you have assessed negative potential impact for any people who share one or more of the protected characteristics, you will need to also assess whether that negative potential impact is high, medium or low.

**(N.B. Impact will not be equally negative or positive or neutral for all groups. There will be differing degrees of impact, the purpose of this section is to highlight whether it is disproportionately different)**

a) Identify the potential impact of the policy/service/proposal on men and women:

| Gender                     | Positive | Negative (please specify if High, Medium or Low) | Neutral | Reason  |
|----------------------------|----------|--|---------|---|
| Women                      | ✓        |  |         | The strategy protect the security of tenancy for certain groups forced to move, including victims of domestic violence , of which women are over represented. |
| Men                        | ✓        |  |         | Men are over-represented among the rough sleeping population the City houses. Providing a lifetime tenancy will give greater stability to this group.         |
| Transgender/<br>transexual |          |  | ✓       | No data is available to allow an assessment of impact   |

b) identify the potential impact of the policy/service/proposal on the basis of the following:

|             | Positive | Negative (please specify if High, Medium or Low) | Neutral | Reason |
|-------------|----------|--|---------|--------|
| Pregnancy & |          |  | ✓       |        |

|   |  |  |   |   |
|---|--|--|---|---|
| <b>Maternity</b>                        |  |  |   |   |
| <b>Marriage &amp; Civil Partnership</b> |  |  | ✓ | There is no differential between tenancies assigned to those who are married and those who are in a Civil Partnership |

c) Identify the potential impact of the policy/service/proposal on different race groups:

| <b>Race</b>  | <b>Positive</b> | <b>Negative (please specify if High, Medium or Low)</b> | <b>Neutral</b> | <b>Reason</b>  |
|--|-----------------|---|----------------|--|
| <b>Asian</b> (including Bangladeshi, Pakistani, Indian, Chinese, Vietnamese, Other Asian Background – please specify_____) |                 | <b>low</b>  |                | It is argued that fixed term tenancies will provide better use of stock (by preventing under-occupation and creating turnover) which could provide more opportunity for overcrowded households. National data evidences that BME households are more likely to be overcrowded. Improved data collection and reporting will enable this potential impact to be monitored. |
| <b>Black</b> (including Caribbean, Somali, Other African, Other black background – please specify_____)                    |                 | <b>low</b>  |                | It is argued that fixed term tenancies will provide better use of stock (by preventing under-occupation and creating turnover) which could provide more opportunity for overcrowded households. National data evidences that BME   |

|  |  |   |   |  |
|--|--|---|---|--|
|  |  |   |   | households are more likely to be overcrowded.<br>Improved data collection and reporting will enable this potential impact to be monitored.   |
| <b>White</b> (including English, Scottish, Welsh, Irish, Other white background – please specify _____)  |  |   | ✓ | No negative impact anticipated   |
| <b>Mixed/ Dual heritage</b> (White and Black Caribbean, White and Black African, White and Asian, Other mixed background - please specify _____) |  | ✓ |   | It is argued that fixed term tenancies will provide better use of stock (by preventing under-occupation and creating turnover) which could provide more opportunity for overcrowded households.<br>National data evidences that BME households are more likely to be overcrowded.<br>Improved data collection and reporting will enable this potential impact to be monitored. |
| <b>Gypsies/Travellers</b>  |  |   | ✓ | No negative impact anticipated   |
| <b>Other</b> (please specify)  |  |   |   |  |



d) Identify the potential impact of the policy/service/proposal on disabled people:

| <b>Disability</b>            | <b>Positive</b> | <b>Negative (please specify if High, Medium or Low)</b> | <b>Neutral</b> | <b>Reason</b>   |
|------------------------------|-----------------|---|----------------|---|
| <b>Physical Disability</b>   | ✓               |   |                | The Strategy specifically safeguards the needs of this group by including this group among those for whom there is an expectation for the provision of a lifetime tenancy |
| <b>Sensory Impairment</b>    | ✓               |   |                | The Strategy specifically safeguards the needs of this group by including this group among those for whom there is an expectation for the provision of a lifetime tenancy |
| <b>Learning Difficulties</b> | ✓               |   |                | The Strategy specifically safeguards the needs of this group by including this group among those for whom there is an expectation for the provision of a lifetime tenancy |
| <b>Mental Health Issues</b>  | ✓               |   |                | The Strategy specifically safeguards the needs of this group by including this group among those for whom there is an expectation for the provision of a lifetime tenancy |

e) Identify the potential impact of the policy/service/proposal on different age groups:

| <b>Age Group (specify,</b> | <b>Positive</b> | <b>Negative (please</b> | <b>Neutral</b> | <b>Reason</b> |
|----------------------------|-----------------|-------------------------|----------------|---------------|
|----------------------------|-----------------|-------------------------|----------------|---------------|

|  |   |  |  |  |
|--|---|--|--|--|
| <b>for example younger, older etc)</b> |   | <b>specify if High, Medium or Low)</b> |  |  |
| Older People                           | ✓ |  |  | The Strategy specifically safeguards the needs of this group by including this group among those for whom there is an expectation for the provision of a lifetime tenancy  |
| Young People/children                  | ✓ | <b>low</b>                             |  | Lifetime tenancies will provide stability for children. Some specific schemes may offer fixed term tenancies to younger people as they are the recipient of a targeted programme (such as housing linked to training). |

f) identify the potential impact of the policy/service/proposal on lesbians, gay men, bisexual or heterosexual people:

| <b>Sexual Orientation</b> | <b>Positive</b> | <b>Negative (please specify if High, Medium or Low)</b> | <b>Neutral</b> | <b>Reason</b>   |
|---------------------------|-----------------|---|----------------|---|
| <b>Lesbian</b>            |                 |   | ✓              | No data is available to allow an assessment of impact |
| <b>Gay Men</b>            |                 |   | ✓              | No data exists to allow an assessment of impact       |
| <b>Bisexual</b>           |                 |   | ✓              | No data exists to allow an assessment of impact       |
| <b>Heterosexual</b>       |                 |   | ✓              | No data exists to allow an assessment of impact       |

g) Identify the potential impact of the policy/service/proposal on different religious/faith groups?

| Religious/Faith groups (specify) | Positive | Negative (please specify if High, Medium or Low) | Neutral | Reason                         |
|----------------------------------|----------|--|---------|--------------------------------|
| Buddhist                         |          |  | ✓       | No negative impact anticipated |
| Christian                        |          |  | ✓       | No negative impact anticipated |
| Hindu                            |          |  | ✓       | No negative impact anticipated |
| Jewish                           |          |  | ✓       | No negative impact anticipated |
| Muslim                           |          |  | ✓       | No negative impact anticipated |
| Sikh                             |          |  | ✓       | No negative impact anticipated |
| Other (please specify)           |          |  | ✓       | No negative impact anticipated |

h) As a result of completing Question 1 a-f above what is the potential impact of your policy?

High  Medium  Low

2. Could you minimise or remove any negative potential impact? Explain How.

The City recognises that lifetime tenancies play an important role in supporting the well-being of its residents by providing stability and certainty, and by creating a sense of belonging. In such circumstances residents are more willing to invest in their communities and properties.

While the need to make the most effective use of the City's housing stock remains a priority, the City believes this is better achieved by providing support, information and incentives to tenants to facilitate transfer within the social housing stock or assist moves to other tenures where this is an informed choice.

The City believes this will minimise any negative potential impact on overcrowded households.

3. If there is no evidence that the policy promotes equality of opportunity or prevents unlawful discrimination– could it be adapted so that it does? How?

Please ensure that all actions identified are included in the attached action plan and reflected in your service plan.

Please sign and date this form, keep one copy and send one to Equality, Diversity & Human Rights Manager

Signed

Signed

Signed

Lead Officer

Service Head

Date

Date

Date

## Action Plan

| Recommendation  | Key activity | Progress milestones | Officer Responsible | Progress |
|---|--------------|---------------------|---------------------|----------|
| Improve quality monitoring and data for tenants and waiting list applicants |              |                     |                     |          |
|   |              |                     |                     |          |
|   |              |                     |                     |          |
|   |              |                     |                     |          |
|   |              |                     |                     |          |