



‘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: People

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: Horace Jones House local lettings policy

Is this a new or revised policy: new

Date policy scheduled for Committee (if relevant): 10 July 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? *Please specify what monitoring information you have available (your monitoring information should be compared to the current available census data or more recent population data if available to see whether a proportionate number of people are taking up your service).*

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.

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.

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 proportion of the City's population that is black is smaller in comparison to both the London wide population and that of England and Wales. Figures and changes since 2001 are shown in Table 1.

	City of London		Greater London		England and Wales	
	% 2001	% 2011	% 2001	% 2011	%2001	% 2011
White	84.6	78.6	71.2	59.8	91.3	86
Mixed	2.3	3.9	3.2	5	1.3	2.2
Asian	8.9	12.7	13.2	18.5	4.8	7.5
Black	2.6	2.6	10.9	13.3	2.2	3.3
Other countries	1.7	2.1	1.6	3.4	0.4	1

Table 1: Ethnic Group 2001 and 2011

Source: Office of National Statistics© Crown Copyright

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.

The review and digitisation of housing records, and the further development of the Resident Insight Database, are departmental priorities which will in future provide more detailed profiling of those impacted by service change and policy development, and inform service design and delivery.

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.

The EqIAs for the Housing Strategy, Tenancy Strategy and Homelessness Strategy have been examined in order to inform the completion of this assessment.

C: Your Policy or Function

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

The local lettings policy governs the allocation of 43 affordable homes at Horace Jones House. This includes the 29 homes that the City of London will nominate tenants for, and the 14 units for which the London Borough of Southwark have agreed nomination rights.

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

The LLP for Horace Jones House will deliver a number of policy objectives:

- to diversify the City's stock of social rented homes through the provision of homes at an intermediate rent – increasing the choice available to, and opportunities for, those on medium incomes
- to give priority to existing social tenants in the City of London, and in the City's housing estates in other boroughs in order to meet their

aspirations and housing needs, and generate additional lettings within our stock for others in housing need

- to create a sustainable community by ensuring stable lettings that minimise stock turnover and management costs
- to meet housing need and encourage better management of our stock by giving priority to overcrowded and under occupying households.

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

The Housing Act 1996 enables housing authorities to allocate particular accommodation to people of a particular description, whether or not they fall within the reasonable preference categories. This is the statutory basis for so-called 'local lettings policies' which may be used to achieve a wide variety of housing management and policy objectives.

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

The local lettings policy is being adopted in order to define common practice.

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. To the extent that the London Borough of Southwark has nomination rights, it will also apply to their tenants, waiting list applicants and homeless households.

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

The strategy sits alongside the Housing Strategy, Tenancy Strategy and Housing Allocations Policy.

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?

See section 3.

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?

The policy will govern the prioritisation of tenants nominated by both the City of London and London Borough of Southwark.

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			✓	
Men			✓	
Transgender/ transexual			✓	

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 & Maternity		✓		Homelessness legislation provides specific protections for this group. The prioritisation of other groups may diminish the opportunities for homeless households, but they retain their reasonable preference in the

				allocation of social housing overall, and the prioritisation of existing tenants will create further housing opportunities at social rents for those needs groups.
Marriage & Civil Partnership			✓	

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

Race	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Asian (including Bangladeshi, Pakistani, Indian, Chinese, Vietnamese, Other Asian Background – please specify_____)		✓ (low)		This group is over represented within statutory homelessness applications. The prioritisation of other groups may diminish the opportunities for homeless households, but they retain their reasonable preference in the allocation of social housing overall, and the prioritisation of existing tenants will create further housing opportunities at social rents for those needs groups.
Black (including Caribbean, Somali, Other African, Other black background – please specify_____)		✓ (low)		This group is over represented within statutory homelessness applications. The prioritisation of other groups may diminish the opportunities for homeless households, but they retain their reasonable preference in the

				allocation of social housing overall, and the prioritisation of existing tenants will create further housing opportunities at social rents for those needs groups.
White (including English, Scottish, Welsh, Irish, Other white background – please specify _____)			✓	
Mixed/ Dual heritage (White and Black Caribbean, White and Black African, White and Asian, Other mixed background - please specify _____)		✓ (low)		This group is over represented within statutory homelessness applications. The prioritisation of other groups may diminish the opportunities for homeless households, but they retain their reasonable preference in the allocation of social housing overall, and the prioritisation of existing tenants will create further housing opportunities at social rents for those needs groups.
Gypsies/Travellers			✓	Annual monitoring statistics suggest there are no clients in this group in the City.
Other (please specify)				

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

Disability	Positive	Negative (please	Neutral	Reason
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		specify if High, Medium or Low)		
Physical Disability			✓	
Sensory Impairment			✓	
Learning Difficulties			✓	
Mental Health Issues			✓	

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

Age Group (specify, for example younger, older etc)	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Older People			✓	The income requirement for these intermediate rent units will exclude low income pensioners. This group may benefit from voids created by the scheme. Older people are more likely to under-occupy and households in this circumstance are given priority for this scheme and in the City's overall allocation scheme. The City is also undertaking a review of the housing needs of older people.
Young People/children			✓	The scheme predominantly provides

				family sized units. The local lettings policy is also aimed at alleviating overcrowding by prioritising this group, and creating voids within existing housing stock to meet these needs.
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f) identify the potential impact of the policy/service/proposal on lesbians, gay men, bisexual or heterosexual people:

Sexual Orientation	Positive	Negative (please specify if High, Medium or Low)	Neutral	Reason
Lesbian			✓	
Gay Men			✓	
Bisexual			✓	
Heterosexual			✓	

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			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the policy.
Christian			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the policy.

Hindu			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the policy.
Jewish			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the policy.
Muslim			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the policy.
Sikh			✓	This group is not monitored, but it is not anticipated that faith groups will be impacted negatively by the policy.
Other (please specify)				

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

High ⑤ **Medium** ⑤ **Low** ✓

The safety net provision of legislation more broadly supports those with vulnerabilities such as age, mental health etc and are therefore deemed as priority. In addition, the City of London is committed to monitoring the equalities impact of the strategy within the context of the wider monitoring process.

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

We believe that the policy will create housing opportunities within our stock that will mitigate the negative impacts identified. By creating voids within our social rented homes we will meet those whose housing need is prioritised within our overall Housing Allocations Policy. We also believe that the application of this policy to the 43 units at Horace Jones House will not dominate our Housing Allocations Policy, which governs our overall approach to housing allocations.

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?

We believe that the policy promotes equality of opportunity / prevents unlawful discrimination.

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

Simon Cribbens

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	Digitisation and Resident Insight Database			