

# EQUALITY ANALYSIS (EA) TEMPLATE

**Decision**

*Approved*

**Date**

24/03/17

**What is the Public Sector Equality Duty (PSED)?** [Double click here for more information / Hide](#)

**What is an Equality Analysis (EA)?** [Double click here for more information / Hide](#)

**How to demonstrate compliance** [Double click here for more information / Hide](#)

**Deciding what needs to be assessed** [Double click here for more information / Hide](#)

**Role of the assessor** [Double click here for more information / Hide](#)

**How to carry out an Equality Analysis (EA)** [Double click here for more information / Hide](#)

## The Proposal *Click and hover over the questions to find more details on what is required*

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### 1. What is the Proposal?

The proposal is the approval and implementation of a new Housing Allocations Scheme. The City Corporation is required by s.166A(1) of the Housing Act 1996 to have an allocations scheme for determining the level of priority offered to each applicant for social housing and for defining the procedures to be followed in allocating accommodation. The proposed Housing Allocations Scheme 2017 will replace the 2015 scheme and is intended to provide greater clarity for applicants, to incorporate recent changes in the law and to allocate the City Corporation's housing stock in a fairer and more efficient way.

### 2. What are the recommendations?

The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant's circumstances, ensuring housing goes to those most in need. A bands system can be overly simplistic, failing to distinguish between different circumstances. Our current 'points within bands' system is unclear in its operation.

It is proposed that the threshold at which a household can receive preference as a 'lower income City worker' is tied to the gross earnings that would be received by two people both working full time at the National Living Wage (NLW), rather than being fixed at £26,000pa. In 2017, this would see the threshold increase to £29,640 and gradual increases in this are expected in subsequent years as the Low Pay Commission increases the NLW.

The 'lower income City worker' preference category is also proposed to be renamed as 'lower income City connection' to its criteria expanded to include:

- City residents who work in low income jobs outside of the Square Mile
- City residents who experience problems with their housing costs after losing a job
- City residents who are not in paid employment and who experience problems with their housing costs as a result of welfare reform.

The 2017 scheme proposes including decant moves in the allocations process. By having one system for allocations and decants, all applicants will be able to see who is getting housing and why, increasing trust and confidence in how the City Corporation allocates accommodation.

The new scheme increases the number of groups eligible for a 'Studio Upgrade' move (a transfer from a studio and a one-bed, where there is no other housing need) and increases the priority moves of this type receive. This will be to the benefit of eligible applicants but will also make more, currently relatively scarce, studio flats available for re-letting. 48 per cent of our applicants require studio accommodation while only 31 per cent of lettings are studios. In contrast only 13 per cent of applicants require a one bed flat, while 30 per cent of new lettings are one bed flats. The Studio Upgrade list is primarily intended to manage this mismatch between demand and supply.

The new scheme proposes awarding extra points to homeless households who have been in temporary accommodation for twelve months or longer. This is intended to reduce the length of time households spend in insecure and expensive temporary accommodation, while the lower priority offered for the first twelve months still

encourages those threatened with homelessness to engage with prevention work, rather than relying on an offer of social housing.

The new scheme proposes reducing the priority offered to households who have in some way contributed to their own housing difficulties. This could include:

- Having applied for assistance under Part VII of the Housing Act 1996 and been found intentionally homeless;
- Having moved into unsuitable accommodation to attract or increase priority for re-housing. This will apply when an applicant chose to occupy unsuitable accommodation when suitable and affordable accommodation was likely to be available to them;
- Having refused one Direct Offer, or three offers under Choice Based Lettings, of suitable accommodation from City Corporation.

The 2017 scheme proposes offering additional priority to households where overcrowding has forced siblings of different genders, where one or both is aged ten or over, to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of opposite genders must share a bedroom as they enter puberty.

The new scheme makes a number of other minor and lower impact changes to offer additional clarity, to incorporate changes in the law which have occurred since 2015 and to refine the operation of housing allocations to make best use of the City Corporation's finite housing stock. These are discussed below as they are relevant to a protected characteristic.

### **3. Who is affected by the Proposal?** *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

The groups affected by the proposal will be:

- Current tenants who are on the transfer list and current applicants on the waiting list
- City Corporation tenants, City residents, City workers and others who may wish to join the Housing Register in the future

**Age** [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

#### **Key borough statistics:**

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

## Age

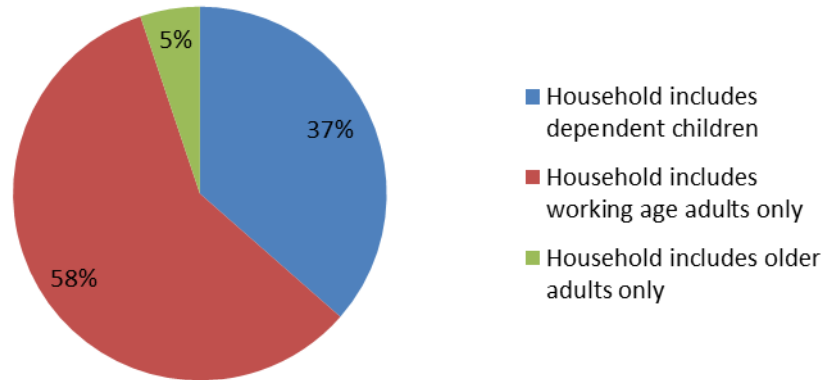
### **Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally live elsewhere.

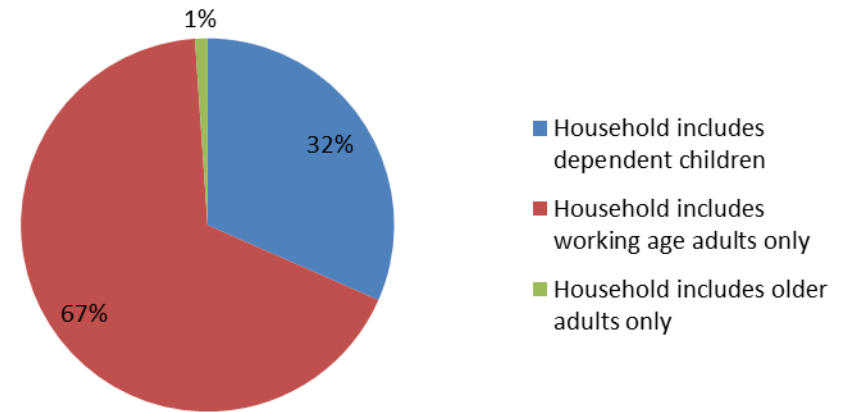
Analysis of the Housing Register provides a better guide to the age breakdown of those most affected by the proposals. The Housing Register can be divided into the waiting list of new applicants and the transfer list of current tenants in need of different accommodation. Also provided is a snapshot of 2016/17 homeless acceptances to date, which forms a small but distinct part of the waiting list of new applicants.

## Age

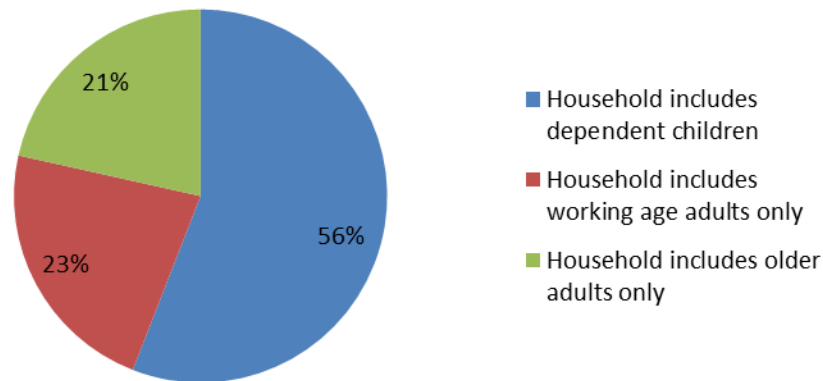
### Housing Register by Age



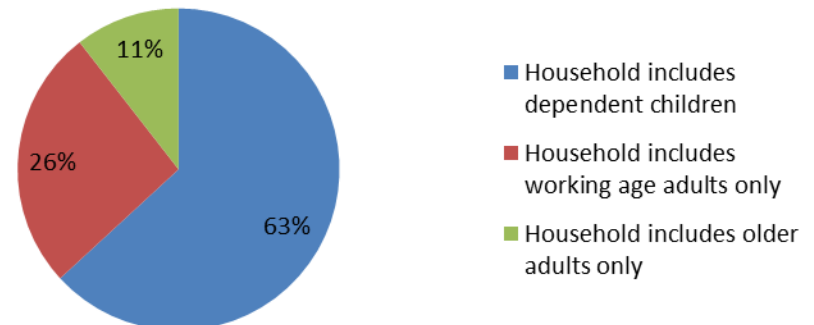
### Waiting List by Age



### Transfer List by Age



### Accepted Homeless Households by Age Profile



Overall the majority of the City Corporation's Housing Register is made up of households containing working age adults only, a sizeable minority of households contain a dependent child, while only 5 per cent are made up of older people. This is heavily influenced by the waiting list of new applicants, most of whom have qualified as lower income City workers.

In contrast the majority of the transfer list is made up of households with dependent children. There is also a sizeable minority of older people. This results in different

## Age

housing needs; 68% of the transfer list are overcrowded, while only 44% of the waiting list are. On the transfer list, 12% are under occupying their current accommodation, while only 4% of the waiting list are doing the same. Typically overcrowding will affect households with children or younger adults living in overcrowded family homes. Under-occupation is more often an issue for older applicants who are living in homes that are too large now their children have left home.

New applicants on the homeless list are even more likely to include dependent children, primarily as a result of the priority need test for gaining a homelessness duty. The homeless list also includes more older people than the waiting list and Housing Register, of which it is a constituent part.

**What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact***

- 1) The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant's circumstances, ensuring housing goes to those most in need.
- 2) The scheme proposes exempting transferring tenants from a number of qualifying criteria, about local connection, household income and savings. This will mean that qualification criteria aimed at new applicants do not unnecessarily obstruct attempts to assist overcrowded households including children or under-occupying older tenants.
- 3) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless families, more likely to include dependent children to be housed faster.
- 4) Increasing the threshold at which a household can receive preference as a 'lower income City worker' will enable more people to join the waiting list. This is expected mainly to benefit working age adults without children.
- 5) The scheme proposes requiring those who are aged 21 and under and who are applying through the 'Sons and Daughters' letting route to pass an affordability check. This is in response to Government proposals to remove Housing Benefit / Universal Credit (Housing Element) from people aged 21 and under.
- 6) The scheme proposes increasing the priority given to the 'Studio Upgrade' letting route, which will move up from position 3 of 4 in the current scheme to position 5 of 12 in the new one. 'Studio Upgrade' enables City Corporation tenants living in a

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

- 1) Mostly positive impact. A more needs focused system will benefit dependent children affected by overcrowding, as well as older people with medical needs. There will be a corresponding loss of priority for those with fewer needs and this may be concentrated amongst working age applicants without children. However working age applicants who also have complex housing needs will benefit.
- 2) Positive impact.
- 3) Positive impact.
- 4) Positive impact.
- 5) This will prevent some 18 – 21 year olds from going on the Housing Register. However, the City Corporation needs to ensure that all new tenancies are likely to be sustainable. The impact is mitigated by requiring an affordability check, which can be met in a number of ways, rather than a blanket increase to the age threshold for the non-statutory 'Sons and Daughters' letting route. 18 – 21 year olds applying through other letting routes (e.g. medical, homeless) are likely to qualify for an exemption to the Housing Benefit restrictions and an affordability check will not be required.
- 6) Further increasing the priority of this category will have a mixed impact on age, as in the current scheme tenants must be aged 45 or over to qualify. Further prioritising the category will adversely impact younger tenants. This is mitigated by

## Age

studio flat with no housing needs to apply for a transfer to a one bedroom flat. Currently, it is open to tenants aged 45 and over only. Studio occupiers with an identified housing need for a one bed can be prioritised in another category, regardless of age.

7) The new scheme proposes offering additional priority to households where overcrowding has forced siblings of different genders, where one or both is aged ten or over, to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of opposite genders must share a bedroom as they enter puberty.

8) The new scheme proposes awarding extra points to homeless households, 63% of which contain a dependent child, who have been in temporary accommodation for twelve months or longer.

9) The new scheme proposes increasing the priority of child welfare cases from band 3 of 4 to group 3 of 12, providing parity with serious adult welfare cases.

10) The new scheme proposes prioritising homeless applicants in priority need (including all those with children or a vulnerable older person) over those who are not.

11) The new scheme proposes providing additional priority to the most severely overcrowded households. Of those likely to be awarded this priority (lacking three bedrooms or more), 100% contain dependent children.

12) The proposed 'priority date' system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on dependent children.

13) The proposed scheme would make a Direct Offer of suitable accommodation to every care leaver on the waiting list, instead of having them bid through Choice Based Lettings (CBL), reducing waiting times.

14) The scheme sets out a threshold stating how much time a dependent child must spend in a household before they will be considered part of that household for the purposes of deciding a property size entitlement. The new scheme proposes lowering this threshold from 51% of the time, to 50% of the time. This change will enable separated couples to share parental responsibility, should they wish to.

expanding the Studio Upgrade category to include younger couples as well as single tenants whose children do not live with them, but who visit regularly. Younger people who live in a studio but require a one bed for a medical or welfare reason will continue to be awarded priority in the medical / welfare group.

7) Positive impact.

8) Positive impact.

9) Positive impact.

10) Positive impact.

11) Positive impact.

12) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.

13) Positive impact. This system does remove choice from applicants but this is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It also enables those who don't understand or engage with CBL to gain housing too.

14) Positive impact – this is fairer to children of separated parents and will help them to enjoy a relationship with both parents. There is a risk that allocating two bedrooms in different properties to one child will lead to under-occupancy and exacerbate overcrowding for other children. The impact and sustainability of this policy will be monitored.

**Disability** [Double click here to add impact / Hide](#)

Check box if NOT applicable

### Key borough statistics:

Day-to-day activities can be limited by disability or long term illness - In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Extract from summary of the [2011 Census relating to resident population health for the City of London can be found on our website](#).

The 2011 Census identified that for the City of London’s population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little.

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

*Double click here to show borough wide statistics / hide statistics*

## Disability

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

Information about people with disabilities on the Housing Register is not reported on. Relatively few people qualify for medical / welfare priority and those that do are rehoused relatively quickly, due to the high degree of priority already offered.

Of those households accepted as statutorily homeless in 2016-17 to date 11% were found to be vulnerable (and therefore in priority need) due to a physical illness or disability and 11% were found to be vulnerable (and therefore in priority need) due to a mental illness or disability. Applicants on the homeless list are therefore more likely to have disability as a protected characteristic than the general City of London population.

**What is the proposal’s impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

- 1) The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant’s circumstances, ensuring housing goes to those most in need.
- 2) The scheme proposes exempting transferring tenants from a number of qualifying criteria, about local connection, household income and savings. This will mean that qualification criteria aimed at new applicants do not unnecessarily obstruct those who need to transfer for a medical or welfare related reason.
- 3) The new scheme includes caring for a City of London resident or City Corporation tenant as a local connection for the purposes of qualifying.
- 4) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless households, more likely to include someone with a disability, to be housed faster.
- 5) The new scheme proposes discounting any compensation received by a former

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

- 1) Positive impact. A more needs focused system will benefit people with disabilities who are more likely to have medical or welfare (care) needs.
- 2) Positive impact.
- 3) Positive impact – on carers and by association the people they care for.
- 4) Positive impact.
- 5) Positive impact.

## Disability

member of the Armed Forces for a disability or injury sustained on active service for the purposes of calculating savings for qualifying.

6) The new scheme proposes awarding extra points to homeless households, 22% of which contain a person with a disability, who have been in temporary accommodation for twelve months or longer.

7) The proposed 'priority date' system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on people with disabilities.

8) The new scheme proposes prioritising homeless applicants in priority need (including all applications with a person vulnerable due to a physical or mental illness or disability) over those who are not.

9) The new scheme proposes inviting those with the most serious overcrowding, medical and welfare cases to develop Personal Housing Plans to explore other housing options. Those who engage with this advice, but are still unable to resolve their housing needs will be awarded additional priority.

10) The scheme proposes giving greater effect to the Community Covenant, by increasing the priority of former member of the Armed Forces who have sustained a disability or injury sustained on active service.

11) The new scheme proposes a written, guidance-based rather than discretionary, system for determining welfare priority, increasing the clarity and consistency of decision making.

12) The proposed scheme would make a Direct Offer of suitable supported accommodation to waiting list applicants with exceptional support needs, who would be unable to appropriately sustain a general needs tenancy.

13) The proposed scheme would make a Direct Offer of suitable general needs accommodation to applicants ready to move on from supported housing, instead of having them bid through Choice Based Lettings (CBL), reducing waiting times.

6) Positive impact.

7) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.

8) Positive impact.

9) Positive impact. This will benefit those with the most serious medical and welfare issues (who are more likely to have a disability). The proposal does risk disadvantaging those with learning difficulties or mental illness, who may be less able to engage with a Personal Housing Plan. Steps to mitigate this will be implemented as the City Corporation's general approach to PHPs (a product of the Homelessness Reduction Bill) is developed.

10) Positive impact.

11) Positive impact.

12) Mixed impact. This system does remove choice from applicants but this is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It enables those who don't understand or engage with CBL to gain housing too. It is also mitigated by awarding similar, Direct Offer, priority to those ready to move on from supported housing.

13) Positive impact.



**Key borough statistics:**

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Conception and Fertility Rates](#)
- [Live Births and Still Births](#)
- [Maternities](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

**Pregnancy and Maternity**

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals.*

Information about pregnant women and mothers on maternity leave on the Housing Register is not reported on. However, the number of households with dependent children on the Housing Register (37%) shows that for a minority of applicants, pregnancy will be relevant at a point during their application.

Of those households accepted as statutorily homeless in 2016-17 to date, 5% were found to be vulnerable (and therefore in priority need) due to a pregnancy. This does not mean to say that other applicants were not also pregnant but were first found to be in priority need for another reason (e.g. dependent children). Applicants on the homeless list are therefore more likely to have pregnancy / maternity as a protected characteristic than the general City of London population.

**What is the proposal’s impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

- 1) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless households, more likely to include a pregnant woman or mother on maternity leave, to be housed faster.
- 2) The new scheme proposes awarding extra points to homeless households, at least 5% of which contain a pregnant woman or mother on maternity leave, who have been in temporary accommodation for twelve months or longer.
- 3) The proposed ‘priority date’ system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on pregnant women and mothers on maternity leave.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

- 1) Positive impact.
- 2) Positive impact.
- 3) Negative impact – but a proportionate one to the City Corporation’s need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.

**Key Borough Statistics:**

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally.

White British residents comprise 57.5% of the total population, followed by White – Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest percentage in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

[See ONS Census information](#) or [Greater London Authority projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below

[Double click here to show borough wide statistics / hide statistics](#)

**Race****Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally live elsewhere.

Analysis of the Housing Register provides a better guide to the ethnic breakdown of those most affected by these proposals. The Housing Register can be divided into the waiting list of new applicants and the transfer list of current tenants in need of different accommodation. Also provided (on page 12) is a snapshot of 2016/17 homeless acceptances to date, which forms a small but distinct part of the waiting list of new applicants.

Just under half (48%) of the Housing Register is White, while 42% belong to another ethnic group. The ethnicity of 10% of the Register is not known. Differences emerge between the waiting list of new applicants and the transfer list of established City Corporation tenants. The transfer list contains more White British and Irish (by 13%), more Asian (by 6%) more Black (by 4%) and more Mixed (by 4%) applicants as a result of historical lettings patterns. The waiting list contains more South American (by 15%) and more Other White, generally EU citizens, (by 6%) applicants, as a result of more recent trends in international migration and City employment.

The ethnicity of accepted homeless applicants is recorded differently and is not directly comparable. However even if a working assumption is made to categorise all White British and Irish (25%), White Other (21%) and Central and South American applicants (16%) on the waiting list simply as 'White', the homeless list still contains considerably more White people (74%) than the waiting list (total 62%) of which it forms a constituent part.

Nationally, Black and Minority Ethnic households are more likely than white households to be living in overcrowded conditions – and this is particularly the case for Bangladeshi and Black African households. (*Adrian Jones, Black and minority ethnic communities' experience of overcrowding, August 2010*). Analysis of the City Corporation's waiting list also shows ethnic disparities in the prevalence of overcrowding:

## Race

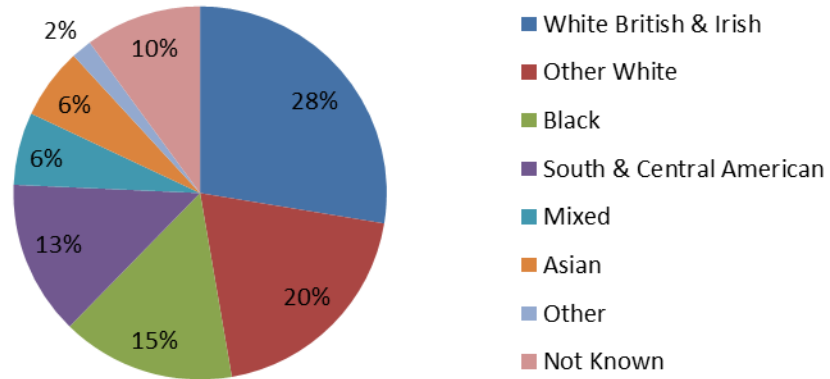
Ethnicity	Percentage of Housing Register overcrowded by at least one bedroom	Percentage of Housing Register overcrowded by at least two bedrooms	Percentage of Housing Register lacking 3 or more bedrooms
Asian	63%	12%	2%
Black	57%	7%	3%
Mixed	57%	11%	0%
South and Central American	51%	7%	0%
<b>Housing Register Average</b>	<b>49%</b>	<b>6%</b>	<b>1%</b>
Other	47%	13%	6%
Not Known	47%	6%	1%
Other White	47%	6%	1%
White British	43%	4%	1%

This shows that the picture of overcrowding on the City Corporation's waiting list is in line with national data. Asian, Black and Mixed households are considerably more overcrowded than the average, while White households are considerably less overcrowded.

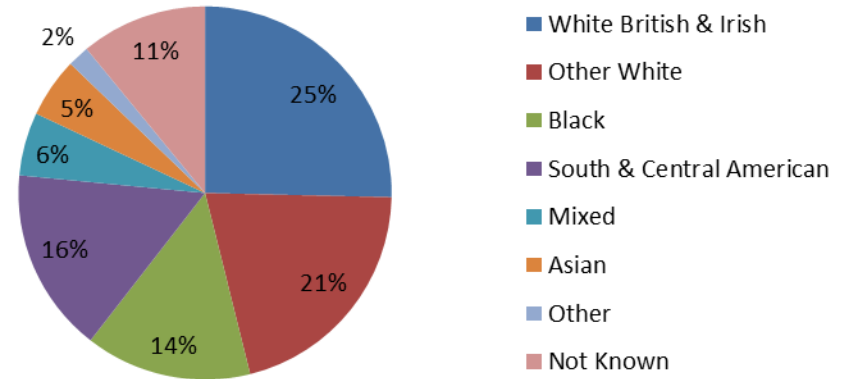
Incidences of severe and very severe overcrowding are much rarer, but the ethnic trends persist. The exception to this is the 'Other' ethnic group, which while affected by an average amount of moderate overcrowding, is the most likely to lack 2 or 3 or more bedrooms. While worthy of note this statistic should be treated with caution due to the very low number of households in the 'Other' group (2 families lacking 2 rooms and 1 lacking 3).

Race

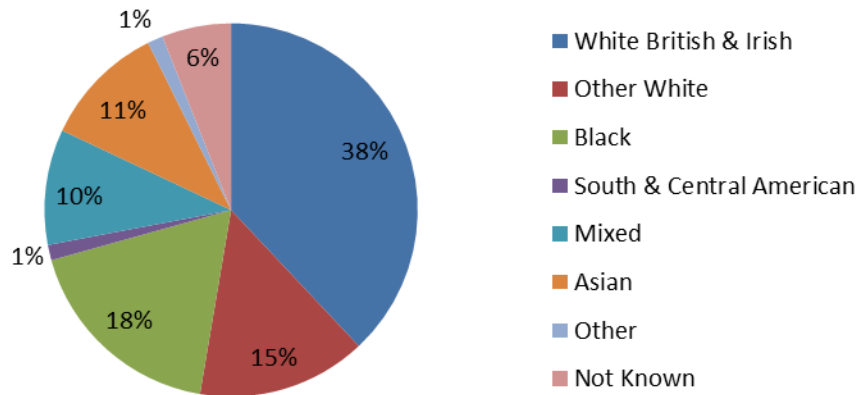
**Housing Register by Ethnicity**



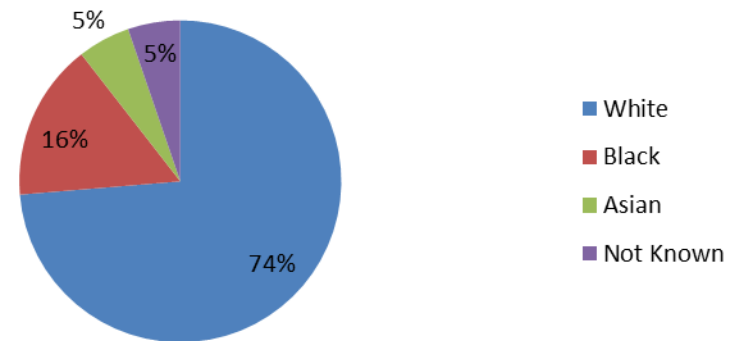
**Waiting List by Ethnicity**



**Transfer List by Ethnicity**



**Accepted Homeless Applicants by Ethnicity**



## Race

**What is the proposal's impact on the equalities aims?** Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

1) The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant's circumstances, ensuring housing goes to those most in need.

2) The scheme proposes exempting transferring tenants from a number of qualifying criteria, about local connection, household income and savings. This will mean that qualification criteria aimed at new applicants do not unnecessarily obstruct attempts to assist overcrowded households.

3) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless families, more likely to be White, to be housed faster.

4) The new scheme proposes awarding extra points to homeless households, 74% of which are White, who have been in temporary accommodation for twelve months or longer.

5) The proposed 'priority date' system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on White applicants.

6) The new scheme proposes offering additional priority to households where overcrowding has forced siblings of different genders, where one or both is aged ten or over, to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of opposite genders must share a bedroom as they enter puberty.

7) The new scheme proposes inviting those with the most serious overcrowding, medical and welfare cases to develop Personal Housing Plans to explore other housing options. Those who engage with this advice, but are still unable to resolve their housing needs will be awarded additional priority.

8) The proposed scheme would make a Direct Offer of suitable accommodation to every care leaver on the waiting list, instead of having them bid through Choice Based Lettings (CBL), reducing waiting times.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

1) Mostly positive impact. A more needs focused system will benefit BAME households affected by overcrowding. There will be a corresponding loss of priority for those with fewer needs and this may be concentrated amongst White households. However White applicants who also have complex housing needs will benefit.

2) Positive impact.

3) Positive impact.

4) Positive impact.

5) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.

6) Positive impact on overcrowded (and more likely to be BAME) households.

7) Positive impact. This will benefit the most overcrowded (and more likely to be BAME) households. The proposal does risk disadvantaging those with limited English, who will be less able to engage with a Personal Housing Plan. Steps to mitigate this will be implemented as the City Corporation's general approach to PHPs (a product of the Homelessness Reduction Bill) is developed.

8) Positive impact (as most of the City Corporation's Looked After Children are Unaccompanied Asylum Seeking Children). This system does remove choice from applicants but this is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It also

## Race

9) The new scheme proposes providing additional priority to the most severely overcrowded households. Of those likely to be awarded this priority (lacking three bedrooms or more), 79% are from a non White ethnic group.

enables those who don't understand or engage with CBL to gain housing too.  
9) Positive impact.

## Religion or Belief [Double click here to add impact / Hide](#)

Check box if NOT applicable

Religion and belief are not thought to have relevance for housing needs and allocations independently of race.

## Sex [Double click here to add impact / Hide](#)

Check box if NOT applicable

### Key borough statistics:

At the time of the [2011 Census the usual resident population of the City of London](#) could be broken up into:

- 4,091 males (55.5%)
- 3,284 females (44.5%)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

## Sex

### **Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

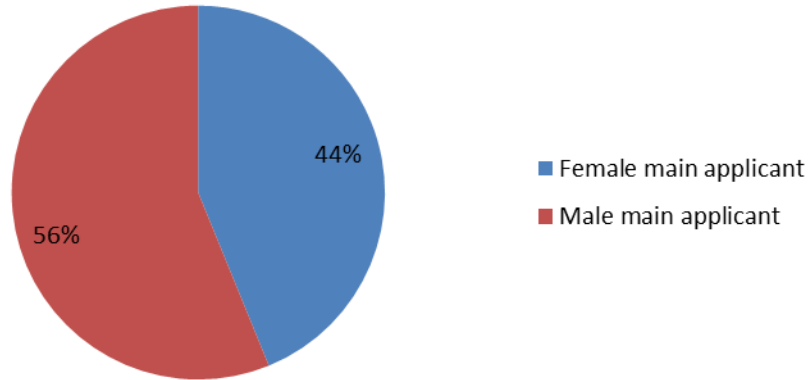
The above borough statistics are of limited use when discussing housing allocations. Of the City's twelve housing estates (the source of all transfer applications), ten are located outside of the Square Mile. Most new applicants on the waiting list qualify by virtue of working in the City, but they generally live elsewhere.

Analysis of the Housing Register provides a better guide to the gender of those most affected by these proposals. The Housing Register can be divided into the waiting list of new applicants and the transfer list of current tenants in need of different accommodation. Also provided (on page 15) is a snapshot of 2016/17 homeless acceptances to date, which forms a small but distinct part of the waiting list of new applicants.

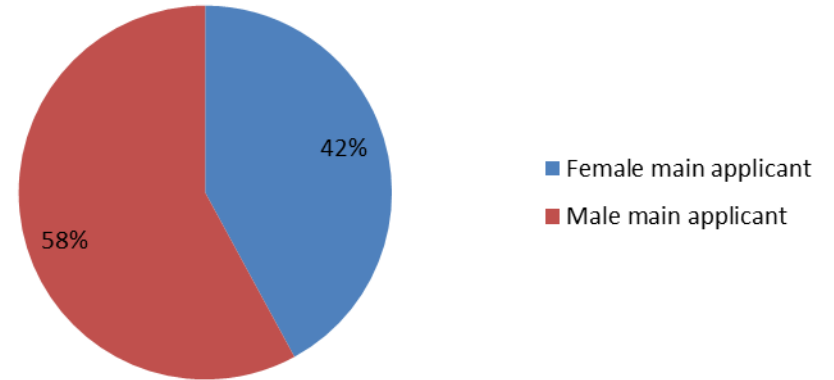
Well over half of applications on the Housing Register and the waiting list are made by a male applicant (who may or may not have a partner). The transfer list is evenly split, and around a quarter of transfer applications are in a male tenant's name. In contrast, well over half of homeless applications are made by a female applicant.

In other respects, applications submitted by male and female applicants are similar. 50% of male applicants are overcrowded, while 48% of female applicants are. 6% of male applicants are under-occupying, while 5% of female applicants are.

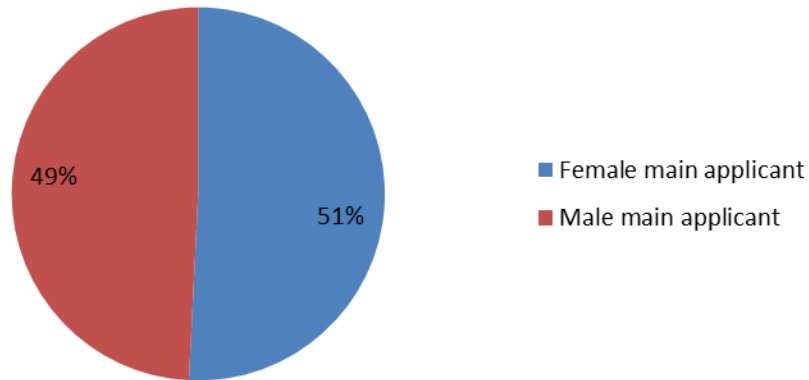
### Housing Register by Gender



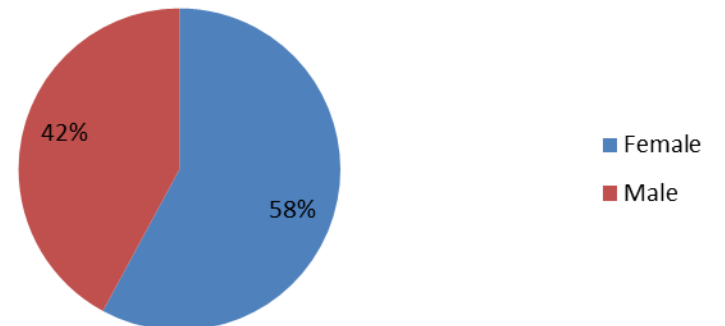
### Waiting List by Gender



### Transfer List by Gender



### Accepted Homeless Applicants by Gender of Main Applicant



## Sex

**What is the proposal's impact on the equalities aims?** Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

- 1) The scheme proposes exempting homeless households from further local connection requirements (in addition to those already included in the Part VII homeless process). This will enable homeless families, more likely to be female, to be housed faster.
- 2) The new scheme proposes awarding extra points to homeless households, 58% of which are headed by a woman, who have been in temporary accommodation for twelve months or longer.
- 3) The proposed 'priority date' system includes a provision that a homeless acceptance will always reset this date, lengthening waiting times. The makeup of the homeless list means this will have a disproportionate effect on women.
- 4) The new scheme proposes offering additional priority to households where overcrowding has forced siblings of different genders, where one or both is aged ten or over, to share a bedroom. This is because the psychological effects of overcrowding are worse when siblings of opposite genders must share a bedroom as they enter puberty.
- 5) The new scheme expands the definition of domestic violence from physical violence to also include psychological, sexual, financial and emotional abuse.
- 6) The scheme proposes increasing the priority given to the 'Studio Upgrade' letting route, which will move up from position 3 of 4 in the current scheme to position 5 of 12 in the new one and expanding the category to include younger couples as well as parents whose children do not live with them, but visit regularly.
- 7) The scheme sets out a threshold stating how much time a dependent child must spend in a household before they will be considered part of that household for the purposes of deciding a property size entitlement. The new scheme proposes lowering this threshold from 51% of the time, to 50% of the time. This change will enable separated couples to share parental responsibility, should they wish to.
- 8) The scheme proposes raising the threshold City workers must earn beneath to receive preference in the 'lower income City connection' category from £26,000 to £29,640. This will enable a number of applicants to move up from the 'low priority' group to a group from which they could realistically hope to receive an offer of accommodation.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

- 1) Positive impact.
- 2) Positive impact.
- 3) Negative impact – but a proportionate one to the City Corporation's need to manage the use of temporary accommodation. The effect is mitigated by greatly increasing the priority of homeless households after twelve months.
- 4) Positive impact.
- 5) Positive impact.
- 6) Positive impact – as the non-resident parents afforded increased priority here are at least 95% male (*Statutory Child Maintenance Caseload, Department for Work and Pensions, 2010*).
- 7) Positive impact – as per the answer to point 6, we believe the parents most likely to lose out on contact with their children under the 51% rule, are male.
- 8) Positive impact. The '*Annual Survey of Hours and Earnings 2016 - Workplace Analysis*' shows that pay is substantially lower for women working in the City. The median annual gross pay of the second lowest tenth of men working in the City is £35,433. The median annual gross pay of the second lowest tenth of women working in the City is £24,420. Therefore, while many people could be advantaged by this change, the majority of them will be women, who are underrepresented on our waiting list.



**Key borough statistics – suggested sources include:**

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity – ONS](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

**Sexual Orientation and Gender Reassignment**

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

Information the Sexual Orientation and Gender Reassignment of people on the Housing Register is not reported on.

**What is the proposal’s impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

- 1) The proposed allocations scheme makes no distinction between applicants based on sexual orientation or between homosexual and heterosexual relationships.
- 2) The allocations scheme sets out the City Corporation’s bedroom standard, which guides how many bedrooms each household is entitled to based on the ages and genders of household members and the relationships between them. Language has been changed from ‘same sex / opposite sex’ to ‘same gender / different gender’ to be more inclusive of trans people to enable the Bedroom Standard to have the flexibility to adequately meet their needs.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

- 1) No impact (this does not represent a change in policy).
- 2) Positive impact.

**Key borough statistics - sources include:**

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

**Marriage and Civil Partnership**

**Additional Equalities Data (Service level or Corporate)** *Include data analysis of the impact of the proposals*

Information the Marriage and Civil Partnership status of people on the Housing Register is not reported on.

**What is the proposal’s impact on the equalities aims?** *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

- 1) The proposed allocations scheme makes no distinction between applicants who are married and those who are in a civil partnership.
- 2) Where special provision is made for applicants who are married or in a civil partnership, the same provision will be made to applicants who have been living together as if in marriage or civil partnership for at least one year.
- 3) The ‘Studio Upgrade’ letting category has been expanded to include married couples, civil partners and couples who have been living together for at least a year and who are overcrowded in studio accommodation.
- 4) The scheme proposes giving greater effect to the Community Covenant, by increasing the priority offered to bereaved spouses whose partners have died during Active Service with the Armed Forces and who now have to leave forces accommodation.

**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**

- 1) No impact (this does not represent a change in policy).
- 2) Positive impact. This treats those who are married or civil partnered as closely as possible with those who are not, while still ensuring that housing is not allocated on the basis of a relationship that may not last in the medium term and therefore result in under-occupancy, or that has been entered into for the purposes of fraudulently securing an offer of larger accommodation.
- 3) Positive impact.
- 4) Positive impact.

## Additional Impacts on Advancing Equality & Fostering Good Relations [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#)

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims. In addition to the sources of information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service

- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

[Double click here to show borough wide statistics / hide statistics](#)

### Additional Impacts on Advancing Equality & Fostering Good Relations

#### Additional Equalities Data (Service level or Corporate)

Type response here

#### Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

- 1) The central recommendation of the 2017 Allocations Scheme is to use a points, rather than bands, based system. A points system is able to take into account the complexity of each applicant's circumstances, ensuring housing goes to those most in need.
- 2) The new scheme proposes applying the 'unacceptable behaviour' disqualification criteria across the board, reducing the priority of those who have contributed to their own housing difficulties and introducing a range of anti-fraud measures.
- 3) The new scheme proposes expanding the 'lower income City worker' preference category to include lower income City residents.
- 4) The new scheme proposes including decant moves in the allocations process.
- 5) The new scheme proposes a written, guidance-based rather than discretionary, system for determining welfare priority, increasing the clarity and consistency of decision making.
- 6) The new scheme implements a priority date system. This allows applicants to keep their waiting time if they move to lower priority group.

#### What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

- 1) Positive impact. The proposed system offers greater clarity for applicants and greater priority to applicants with the greatest need. A demonstrably fair system will foster good relations between those who are likely to be allocated housing and those who are not.
- 2) Positive impact. Prioritising those who are good neighbours and do not try to unfairly increase their own priority will foster good community relations generally.
- 3) Positive impact. It is fair to include alongside City workers those residents who work in a neighbouring borough, those who have lost their job and those who are prevented from working because of age, disability or caring responsibilities.
- 4) Positive impact. By having one system for allocations and decants, all applicants will be able to see who is getting housing and why, increasing trust and confidence in how the City Corporation allocates accommodation.
- 5) Positive impact. Applicants will be able to see who is getting housing and why, increasing trust and confidence in how the City Corporation allocates accommodation.
- 6) Positive impact. Allowing applicants to keep their waiting time softens the impact of a loss of priority and lessens the sense that those with higher needs are 'jumping the queue'.

## Conclusion and Reporting Guidance

*Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.*

*If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.*

*If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.*

*Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.*

*Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.*

### **This analysis has concluded that...**

The proposed Allocations Scheme 2017 would have a number of positive impacts on applicants who share a protected characteristic. By being clearer and fairer than the scheme currently in operation, it will also foster good relations between those who share a protected characteristic and those who do not.

A number of adverse impacts have been identified, however, these are all necessary to achieve wider objectives and appropriate mitigations have been put in place.

- 1) Increasing the priority of the studio upgrade group could have an adverse impact on tenants under 45 living in a studio. This is necessary because the studio upgrade group does not currently have sufficient priority to achieve re-housing, and is not freeing up enough much needed studio accommodation. The impact on under 45s is mitigated by expanding the category to include couples under 45 and non-resident parents whose children regularly visit overnight. People of any age who require a one bedroom flat for a medical or welfare reason are already in a higher group and this will not change.
- 2) Resetting the waiting time upon acceptance of a homeless application could have an adverse impact on children, women, pregnant women, people with a disability and White people, who are all overrepresented on the homeless list. This is necessary to manage the supply of temporary accommodation. The impact is mitigated by greatly increasing the priority of homeless applicants after twelve months in temporary accommodation.
- 3) Adopting a points, rather than bands, system could have an adverse impact on any applicant whose housing needs are less severe. Analysis of overcrowding figures suggests this may include White British and Irish people and people of working age without children. This is necessary to operate a fair system and ensure those with the greatest needs are offered the greatest priority. This is mitigated as, should White British and Irish people and people of working age without children also have severe or complex housing needs, they would also receive greater priority.
- 4) Requiring 'Sons and daughters' aged between 18-21 to pass an affordability check could have adverse impacts on people in this age group. This is necessary due to changes in national welfare legislation and to prevent the creation of unsustainable tenancies that are likely to end in eviction due to rent arrears. This is mitigated as an affordability check is being implemented, rather than a blanket change in the 'Sons and daughters' criteria. People aged 18-21 who are applying for reasonable preference under the Housing Act 1996, or with a lower income City connection, will also not be affected by this rule.
- 5) Removing applicants with exceptional support needs from Choice Based Lettings could have an adverse impact on people with disabilities. This is necessary to prevent the creation of unsustainable tenancies that are likely to fail or end in eviction. This is mitigated by meeting with the applicant and their social worker to discuss their preferences for accommodation prior to an offer being made. It also enables those who don't understand or engage with CBL to gain housing too. It is further mitigated by awarding similar, Direct Offer, priority to those ready to move on from supported housing.
- 6) Use of Personal Housing Plans for applicants with severe housing needs could adversely impact on those less able to understand and implement the advice they are offered, either due to a lack of English, learning disabilities or mental health issues. This is necessary to ensure no opportunity is missed to resolve an applicant's housing

**This analysis has concluded that...**

needs. Further work will be done to develop a protocol on Personal Housing Plans to ensure they are tailored to individual needs and capabilities.

Running through the new allocations scheme is an understanding that the rules cannot hope to anticipate every circumstance applicants may face. A general power of discretion is given to the Assistant Director for Housing and Neighbourhoods to address exceptional cases. This may involve granting additional priority, approving direct offers of re-housing or exempting applicants from one or more of the rules set out elsewhere in the scheme. This provision is designed to take account of all factors relevant to housing and social needs, including those related to protected characteristics.

**Outcome of analysis** - *check the one that applies*

**Outcome 1**

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

**Outcome 2**

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

**Outcome 3**

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should in line with the duty have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

**Outcome 4**

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

**Signed off by Director:**

N.Hounsell

**Name:**

Neal Hounsell

**Date:**

24/03/17