EQUALITY ANALYSIS (EA) TEMPLATE

Decision		Date	

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 drafting, approval and implementation of a Mutual Exchange Policy. The policy document will briefly set out the law relating to the option our tenants have to exchange their home with another of our tenants, or a tenant of another housing provider. The policy will also set out our stance on aspects such as payments and other common issues which arise during a moving process. The policy is intended to provide a transparent source of information which will support the decisions we make.

2. What are the recommendations?
There is no current policy; the recommendation is to draft, publish and implement a policy. This policy will not represent a change in our approach, but the transparent publication of the approach we already take.

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;
- Our prospective tenants while mutual exchange is being negotiated;
- Those who become our tenants via mutual exchange.

These tenants or prospective tenants could fall into any one of the protected characteristics as outlined below, as such, this analysis documentation will refer to 'those affected', throughout with examples where appropriate.

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*

We do not currently have additional Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.

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***	**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**
Those directly affected by the policy will be over the age of 18, as tenancies may only be granted to those over the age of 18. For those over 18, age will have no bearing on the application of the policy directly. The ages of household members and familial relations within the household can have an impact on whether the City may approve a mutual exchange. For example, we cannot allow overcrowding to be exacerbated by a mutual exchange. As such, we will follow the thresholds of our Social Housing Allocations Policy when determining whether a mutual exchange may proceed.	No further action required.

Disability Double click here to add impact / Hide

Check box if NOT applicable ☐

Key borough statistics:	The 2011 Census identified that for the City of London's population:
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.	• 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".

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Disability

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Those with disabilities or health needs that are affected by their current home may seek a move to a home that better meets their needs. This is particularly beneficial	No further action required.

Disability	
in situations where the level of impact that their current home has upon the disability or health need is insufficient to secure high levels of medical or welfare related points under the relevant Allocation Policy which may prevent the tenant from 'transferring'. In this situation, a mutual exchange can be a beneficial option.	

Pregnancy and Maternity Double click here to add impact / Hide

Check box if NOT applicable ☐

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.* We do not currently have additional Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.	
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*** When a decision is made regarding whether a mutual exchange will proceed, where there is a household member who is expecting a child, the child or children due will be considered when calculating whether the size of the home is suitable for the household.	**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?** No further action required.

Race Double click here to add impact / Hide

Check box if NOT applicable ☐

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

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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***	**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**
The policy applies to all of our residents and their household, and we recognise that this will include those of all races.	N/A.

Religion or Belief Double click here to add impact / Hide

Check box if NOT applicable ☐

Key borough statistics – sources include:
The ONS website has a number of data collections on religion and belief, grouped under the theme of religion and identity.
Religion in England and Wales provides a summary of the Census 2011 by ward level

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Double click here to show borough wide statistics / hide statistics

Religion or Belief

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

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***	**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**
The policy applies to all of our residents and their households, and we recognise that this will include those of any religion or belief, or none.	N/A.

Sex *Double click here to add impact* / Hide

Check box if NOT applicable ☐

Key borough statistics:	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:
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%)	• 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*

We do not currently have additional Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.

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***	**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**
The policy applies to all of our residents and their households, and we recognise that this will include those of any sex.	N/A.

Sexual Orientation and Gender Reassignment Double click here to add impact / Hide

Check box if NOT applicable ☐

Key borough statistics – suggested sources include:	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".
• Sexual Identity in the UK – ONS 2014 • Measuring Sexual Identity – ONS	

Double click here to show borough wide statistics / hide statistics

Sexual Orientation and Gender Reassignment

Sexual Orientation and Gender Reassignment

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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***	**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**
The policy applies to all of our residents and their households, and we recognise that this will include those of any sexual orientation or those undertaking gender reassignment.	N/A.

Marriage and Civil Partnership Double click here to add impact / Hide

Check box if NOT applicable ☐

Key borough statistics - sources include:	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".
• The 2011 Census contain data broken up by local authority on marital and civil partnership status	

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*

We do not currently have additional Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.

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***	**What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?**
Those who are married or within a civil partnership may have a joint tenancy. Where a mutual exchange is proposed, any parties within a joint tenancy must be in agreement with the proposed exchange. If there is an absent tenant in one of our tenancies, the Tenancy Policy process relating to absent tenants must be followed and completed before the mutual exchange may proceed. If there is an absent tenant in the proposed exchange partner's tenancy, the relevant housing provider must resolve the situation before the exchange may proceed.	No further action required.

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)

We do not currently have additional Equalities Data regarding our residents; in our 'data refresh' project in 2017/18 this will be updated.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?	**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.
The Mutual Exchange policy will foster good relations by presenting the City's approach in a transparent way. The City's intention is to both comply with the law and offer a fair service.	To prevent negative impact, owing to the complexity of family relations and housing law we have included the following clause in the policy: *In exceptional circumstances, the City of London Corporation may consider variations to this policy. The variation will depend upon the individual situation, any extenuating circumstances and the evidence available.* This enables us to ensure we have the capacity to make decisions that are appropriate dependent upon circumstances that may arise.

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…

There is no negative impact caused by the drafting, publication and implementation of a Mutual Exchange policy. The Mutual Exchange policy will foster good relations by presenting the City's approach in a transparent way. The City's intention is to both comply with the law and offer a fair service.

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:		**Name:**		**Date:**	