

EQUALITY ANALYSIS (EA) TEMPLATE

Decision *COLPAI and Isleden House Local Letting Policies*

Date

November 2022



What is the Public Sector Equality Duty (PSED)?

<p>The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have ‘due regard’ to the need to:</p> <ul style="list-style-type: none"> • Eliminate discrimination, harassment and victimisation • Advance equality of opportunity between people who share a protected characteristic and those who do not, and Foster good relations between people who share a protected characteristic and those who do not <p>The characteristics protected by the Equality Act 2010 are:</p> <ul style="list-style-type: none"> • Age • Disability • Gender reassignment • Marriage and civil partnership • Pregnancy and maternity • Race • Religion or belief • Sex (gender) • Sexual orientation <p>What is due regard?</p> <ul style="list-style-type: none"> • It involves considering the aims of the duty in a way that is proportionate to the issue at hand • Ensuring real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that influences the final decision 	<p>The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.</p> <p>Case law has established the following principles apply to the PSED:</p> <ul style="list-style-type: none"> • Knowledge – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind. • Sufficient Information – must be made available to the decision maker. • Timeliness – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken. • Real consideration – consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision. • Sufficient information – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty. • No delegation – public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated. • Review – the duty is not only applied when a policy is developed and decided upon, but also when it is implemented and reviewed.
<ul style="list-style-type: none"> • Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can be cumulative. 	

What is an Equality Analysis (EA)?

An equality analysis is a risk assessment tool that examines whether different groups of people are, or could be, disadvantaged by service provision and decisions made. It involves using quality information, and the results of any engagement or consultation with particular reference to the protected characteristics to understand the actual effect or the potential impact of policy and decision making decisions taken.

The equality analysis should be conducted at the outset of a project and should inform policy formulation/proposals. It cannot be left until the end of the process.

The purpose of the equality analysis process is to:

- Identify unintended consequences and mitigate against them as far as possible, and
- Actively consider ways to advance equality and foster good relations.

The objectives of the equality analysis are to:

- Identify opportunities for action to be taken to advance quality of opportunity in the widest sense;
- Try and anticipate the requirements of all service users potentially impacted;
- Find out whether or not proposals can or do have any negative impact on any particular group or community and to find ways to avoid or minimise them;
- Integrate equality diversity and inclusion considerations into the everyday business and enhance service planning;
- Improve the reputation of the City Corporation as an organisation that listens to all of its communities;
- Encourage greater openness and public involvement.

However, there is no requirement to:

- Produce an equality analysis or an equality impact assessment
- Indiscriminately collect diversity data where equalities issues are not significant
- Publish lengthy documents to show compliance
- Treat everyone the same. Rather, it requires public bodies to think about people's different needs and how these can be met
- Make service homogenous or to try to remove or ignore differences between people.

An equality analysis should indicate improvements in the way policy and services are formulated. Even modest changes that lead to service improvements are important. In it is not possible to mitigate against any identified negative impact, then clear justification should be provided for this.

By undertaking an equality analysis officers will be able to:

- Explore the potential impact of proposals before implementation and improve them by eliminating any adverse effects and increasing the positive effects for equality groups
- Contribute to community cohesion by identifying opportunities to foster good relations between different groups
- Target resource more effectively
- Identify direct or indirect discrimination in current policies and services and improve them by removing or reducing barriers to equality

How to demonstrate compliance

The Key point about demonstrating compliance with the duty are to:

- Collate sufficient evidence to determine whether changes being considered will have a potential impact on different groups.
- Ensure decision makers are aware of the analysis that has been undertaken and what conclusions have been reached on the possible implications.
- Keep adequate records of the full decision making process.

In addition to the protected groups, it may be relevant to consider the impact of a policy, decision or service on other disadvantaged groups that do not readily fall within the protected characteristics, such as children in care, people who are affected by socio-economic disadvantage or who experience significant exclusion or isolation because of poverty or income, education, locality, social class or poor health, ex-offenders, asylum seekers, people who are unemployed, homeless or on a low income.

Complying with the Equality Duty may involve treating some people better than others, as far as this is allowed by discrimination law. For example, it may involve making use of an exception or the positive action provisions in order to provide a service in a way which is appropriate for people who share a protected characteristic – such as providing computer training to older people to help them access information and services.

Taking account of disabled people's disabilities

The Equality Duty also explicitly recognises that disabled people's needs may be different from those of non-disabled people. Public bodies should therefore take account of disabled people's impairments when making decisions about policies or services. This might mean making reasonable adjustments or treating disabled people better than non-disabled people in order to meet their needs.

Deciding what needs to be assessed

The following questions can help determine relevance to equality:

- Does the policy affect service users, employees or the wider community, including City businesses?
- How many people are affected and how significant is the impact on them?
- Is it likely to affect people with particular protected characteristics differently?
- Is it a major policy, significantly affecting how functions are delivered?
- Will the policy have a significant impact on how other organisations operate in terms of equality?
- Does the policy relate to functions that engagement has identified as being important to people with particular protected characteristics?
- Does the policy relate to an area with known inequalities?
- Does the policy relate to any equality objectives that have been set?

Consider:

- How the aims of the policy relate to equality.
- Which aspects of the policy are most relevant to equality?
- Aims of the general equality duty and which protected characteristics the policy is most relevant to.

If it is not clear if a policy or decision needs to be assessed through an equality analysis, a Test of Relevance screening tool has been designed to assist officers in determining whether or not a policy or decision will benefit from a full equality analysis.

Completing the Test of Relevance screening also provides a formal record of decision making and reasoning. It should be noted that the PSED continues up to and after the final decision is taken and so any Test of Relevance and/or full Equality Analysis should be reviewed and evidenced again if there is a change in strategy or decision.

Role of the assessor

An assessor's role is to make sure that an appropriate analysis is undertaken. This can be achieved by making sure that the analysis is documented by focussing on identifying the real impact of the decision and set out any mitigation or improvements that can be delivered where necessary.

Who else is involved?

Chief Officers are responsible for overseeing the equality analysis proves within departments to ensure that equality analysis exercises are conducted according to the agreed format and to a consistent standard. Departmental equality representatives are key people to consult when undertaking an equality analysis.

Depending on the subject it may be helpful and easier to involve others. Input from another service area or from a related area might bring a fresh perspective and challenge aspects differently.

In addition, those working in the customer facing roles will have a particularly helpful perspective. Some proposals will be cross-departmental and need a joint approach to the equality analysis.

How to carry out an Equality Analysis (EA)

There are five stages to completing an Equality Analysis, which are outlined in detail in the Equality Analysis toolkit and flowchart:

2.1 Completing the information gathering and research stage – gather as much relevant equality-related information, data or research as possible in relation to the policy or proposal, including any engagement or consultation with those affected;

2.2 Analyse the evidence – make and assessment of the impact or effect on different equality groups;

2.3 – Developing an action plan – set out the action you will take to improve the positive impact and / or the mitigation action needed to eliminate or reduce any adverse impact that you have identified;

2.4 Director approval and sign off of the equality analysis – include the findings from the EA in your report or add as an appendix including the action plan;

2.5 Monitor and review – monitor the delivery of the action plan and ensure that changes arising from the assessment are implemented.

The Proposal

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1. What is the Proposal

The City of London Corporation has developed local lettings policies for two new build schemes currently being developed at City of London Primary Academy Islington (COLPAI) and Isleden House in Islington.

The scheme includes 66 new flats at COLPAI and 3 new flats at Isleden House, where the City Corporation has a 50% split for allocations with London Borough Islington for COLPAI, and 66% at Isleden House. These new properties will be let at social rent levels. The proposed policies determine the allocation of these properties.

At Isleden House there is a new development of three, 3-bedroom flats, and at COLPAI the scheme consists of thirty-five 1-bedroom flats, twenty-six 2-bedroom flats and five 3-bedroom flats.

The Local Lettings Policies for these new build properties take priority over the City Corporation's Allocations policy for the period set out in the policy. Upon expiration, the City Corporation's Allocations policy will set out any future prioritisation and method of allocation of these properties for social rent.

These new homes are delivered as part of the City Corporation's wider strategic commitment to increase the supply of social housing.

A single Equality Impact Assessment has been created for both schemes due to the similarity of the details set out.

2. What are the recommendations?

To maximise housing stock and opportunities for rehousing these two new developments create, we are seeking agreement from Members to authorise the Local Lettings Policy for both schemes. These policies will allow priority to be given to existing City of London secure tenants who are already registered for a housing transfer.

This will have a positive impact on relieving overcrowding by giving more opportunity for under occupying households to downsize to a smaller property.

This will then create additional property voids ready to be allocated to other City of London social housing applicants.

Overall, this will help us meeting our housing need and encourage better management of our housing stock by giving priority to overcrowded and under occupying households.

3. Who is affected by the Proposal?

Tenants of social housing owned the City of London Corporation, and of other social landlords within the City of London boundary; housing waiting list applicants; and homeless applicants.

As the London Borough of Islington also have nomination rights, it will also affect their tenants, waiting list applicants and homeless households. These individuals are not covered by the City Corporation's Local Lettings policies and will have their own process for allocating properties for those properties they have nomination rights for.

Age

Check this box if NOT applicable

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

Type of Property	Totals (waiting + transfers)	Waiting list	Transfer

Studio	320	320	
One bed	119	74	45
Two bed	200	134	66
Three bed	117	61	56
Four Bed	23	12	11
Total	779	601	178

The above table shows the amount of people currently registered on the City of London

Housing Register. This includes people waiting for different types of property, as well as those waiting for a transfer to either a smaller or larger properties.

Most people waiting for Studio properties are single, working aged people, with the majority being low-income City workers (e.g. those working in hospitality or service industry). One bed property applicants are single people with parental responsibilities for children who do not live with them, couples or people wishing to transfer from a studio property.

All the people who have registered for a transfer to a two-bed property have at least one dependent child. All three bed transfers are people who have at least two children and four bed transfers have at least three children.

Those waiting for on the transfer list as of October 2022, 23 are downsizing to smaller properties of all sizes, 36 currently live in a studio property and have registered for a 1-bed property, and 110 households are facing overcrowding (of which 15 are experiencing severe overcrowding of lacking 2 bedrooms or more).

The data above shows that there are significant numbers waiting for larger properties (particularly two-bed properties) and therefore households in larger properties wanting to downsize will positively impact those who live in overcrowding conditions and require a larger property.

What is the proposal's impact on the equalities aim?

Older people

The proposed policies aim to have a positive impact on this protected characteristic. The newly developed properties allocated through the Local Lettings Policy will be let at social rent, and therefore will be more affordable for low to medium-income households. This will be a positive for households including low to medium-income pensioners. These groups of households may also benefit from voids created by the scheme.

The proposals will also have a positive impact on economic, health and social factors relating to this group. This includes a reducing social care burden if in more appropriate housing, a reduction in potential loneliness and social isolation by being able to stay within the community and for those who can move to a more appropriate sized property, a potential reduction in the cost of heating the property and improvements to health and wellbeing.

Elderly people are more likely to under-occupy and households in this circumstance are given priority within this policy as well as the overall housing allocation scheme.

The policies also give priority to existing social housing tenants on the relevant estate. This will positively impact older residents as they are more likely to have been living on these estates for a longer period, according to national research (there is no local data to support this).

According to the Office of National Statistics in 2021, the proportion of people living alone in England has increased by 8.3% in the past 10 years, with 26% of people in London living in one-person households. Elderly people make up a large part of this increase and the overall number of people living alone and therefore the scheme provides one-bedroom properties which would positively impact single household pensioners who have applied to transfer to a smaller property.

Households with dependents (children and young people)

The proposed policies aim to have a positive impact on households who contain children as dependents. The schemes provide family sized units, and as these policies prioritise households facing overcrowding, will have a positive impact on helping to

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

Most social housing tenants living on City Corporation estates are working age adults, with a sizeable minority of households containing a child dependency or older residents. With the approval of this policy, the negative impact of residents living in overcrowded properties, or properties that have become too big for them will be reduced as priority will be given to local households in the greatest need. This will create additional voids for new social housing tenants or transfers for existing tenants, who may or may not fall into this protected characteristic. By following these policies and the existing Housing Allocation Policy, households in greatest need will be prioritised, which provides a positive impact for this group.

<p>alleviate overcrowding, whilst creating voids within the existing housing stock to further meet need.</p> <p>Furthermore, the proposals will have a positive social and health impact on households with child dependents. Due to the greater number of properties available for transfer and the prioritisation of existing tenants, households facing overcrowding if they are able to move into more appropriate housing will have less of a burden on social care and will have a positive impact on their health and wellbeing. There is also evidence about the negative impact of overcrowding on the educational attainment of children and young people.</p>	
<p>Key borough statistics:</p> <p>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.</p>	<p>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:</p> <ul style="list-style-type: none"> • Population projections <p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Disability

Disability - Additional Equalities Data (Service Level or Corporate)

Information about people with disabilities on the Housing Register is not routinely collected, but it is not anticipated that disabled people will be impacted negatively by the policies. Relatively few people qualify for medical or welfare priority and those that do are rehoused quickly due to the high degree of need.

What is the proposal's impact on the equalities aim?

The impact on the Disability protected characteristic is neutral. Both policies prioritise those with severe medical or welfare need and are prioritised in line with the approach and definitions of the City Corporation's Housing Allocation scheme. However, data about people with disabilities is not routinely collected, but it is not anticipated that disabled people will be impacted negatively by the policies.

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. Additional information on Disability and Mobility data, London, can be found on the [London Datastore](#).

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

In the event of several households meeting the same criteria of severe medical need or welfare need, households will be prioritised in priority date order from when they joined the Housing Register, as set out in the policies. Those with the greatest medical or welfare need will be prioritised, although the number of eligible people who qualify on this ground is low.

To further improve the analysis on the impact of this protected characteristic, improvements in the collection of relevant data of applicants with a disability should be considered. This would allow for greater analysis on the number of individuals impacted in relation to other protected groups.

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 proposal.

Check this box if NOT applicable

Gender Reassignment

Check this box if NOT applicable

Gender Reassignment - Additional Equalities Data (Service Level or Corporate)

Information about gender reassignment in relation to those on the Housing Register is not routinely collected.

What is the proposal's impact on the equalities aim?

The policies do not take into consideration a person's gender assignment as part of the prioritisation of housing transfers or allocation and therefore no impact has been identified.

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

This group is not monitored but it is not anticipated that issues related to gender reassignment will be impacted negatively by these policies.

Key borough statistics:

- [Gender Identity update 2009 - ONS](#)

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

Pregnancy and Maternity

Check this box if NOT applicable

Pregnancy and Maternity - Additional Equalities Data (Service Level or Corporate)

<p>What is the proposal’s impact on the equalities aim?</p> <p>The impact on this protected characteristic is positive. Homelessness legislation provides specific protections for this group, whilst existing tenants are prioritised based on need for transfers to more suitable accommodation. This includes those who are pregnant or have a new born baby if they are currently living in unsuitable accommodation.</p> <p>The prioritisation covered under this protected characteristic may diminish the opportunities for homeless households, but they retain their reasonable preference in the allocation of social housing overall.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>Prioritising existing tenants will create further housing opportunities at social rent for these needs’ groups through newly created voids.</p>
<p>Key borough statistics:</p> <p>Under the theme of population, the ONS website has a large number of data collections grouped under:</p> <ul style="list-style-type: none"> • Contraception and Fertility Rates • Live Births 	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Race

Check this box if NOT applicable

Race - Additional Equalities Data (Service Level or Corporate)

Information about race in relation to those on the Housing Register is not routinely collected.

<p>What is the proposal’s impact on the equalities aim?</p> <p>The overall impact on this protected characteristic is neutral. Residents from an Asian, Black or Mixed Heritage background are overrepresented within statutory homelessness applications. By maximising the allocation of our housing stock by creating more opportunity for applicants to be allocated a property for social will have a positive impact on those waiting on the housing register. However, there is no mechanism in place to ensure that people from a diverse background are being allocated a fair share of properties in relation to the number of the housing waiting list.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>The Prioritisation of existing tenants will create further housing opportunities at social rent for this group and will help to alleviate overcrowding and open up housing opportunities for those facing hardship whilst waiting for housing allocation.</p>
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Check this box if NOT applicable

The policies allow us to better manage our housing stock and increase the opportunities for rehousing. This will have a positive impact on this protected characteristic as this group are overrepresented in those on low-income or receiving state benefits and therefore at greater risk of experienced deprivation.

National data from the Office of National Statistics notes that households from an Asian, Black or Mixed Heritage background are more likely to be a larger family unit than other groups. Therefore, there is a greater risk of overcrowding in these households, particularly those who are multi-generational. Measures put forward within these policies create extra opportunity for overcrowded households to be allocated more appropriate housing and therefore will help alleviate some of these issues.

The prioritisation covered under this protected characteristic may diminish the opportunities for homeless households, but they retain their reasonable preference in the allocation of social housing overall.

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 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 proposal.

Religion or Belief

Religion or Belief - Additional Equalities Data (Service Level or Corporate)

Information about religion or belief in relation to those on the Housing Register is not routinely collected.

What is the proposal's impact on the equalities aim?

Religion and belief are not taken into consideration as part of the housing allocation process and therefore there are no anticipated impact on this protected characteristic.

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](#)

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

This group is not monitored but it is not anticipated that faith groups will be impacted negatively by these policies.

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

Sex

Check this box if NOT applicable

Sex - Additional Equalities Data (Service Level or Corporate)

What is the proposal's impact on the equalities aim?

The sex of an individual or family members are not taken into consideration as part of the housing allocation process and therefore there are no anticipated impact on this protected characteristic.

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

It is not anticipated that this group will be impacted negatively by these policies.

Check this 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 proposal.



Check this box if NOT applicable

Sexual Orientation

Sexual Orientation - Additional Equalities Data (Service Level or Corporate)

Information about sexual orientation in relation to those on the Housing Register is not routinely collected.

<p>What is the proposal’s impact on the equalities aim?</p> <p>Sexual orientation is not taken into consideration as part of the housing allocation process or asked for during the application process and therefore there are no anticipated impact on this protected characteristic.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>This group is not monitored, but it is not anticipated that this group will be impacted negatively by these policies.</p>
<p>Key borough statistics:</p> <ul style="list-style-type: none"> • Sexual Identity in the UK – ONS 2014 • Measuring Sexual Identity - ONS 	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Check this box if NOT applicable

Marriage and Civil Partnership

Check this box if NOT applicable

Marriage and Civil Partnership - Additional Equalities Data (Service Level or Corporate)

<p>What is the proposal's impact on the equalities aim?</p> <p>The number of families that include a couple in a legally registered partnership in the UK has increased by 4% in the past 10-years, to 12.7 million; by comparison, the number of cohabiting couple families saw an increase of 23% over the same period, to 3.6 million.</p> <p>Although most households are in a legally registered partnership, this is not taken into account as part of the Local Lettings Policies, and therefore there are no anticipated impacts on this protected characteristic.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>It is not anticipated that couples married or in a civil partnership will be negatively impacted by these policies.</p>
<p>Key borough statistics – sources include:</p> <ul style="list-style-type: none">• The 2011 Census contain data broken up by local authority on marital and civil partnership status	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposal.</p>

Check this box if NOT applicable

Additional Impacts on Advancing Equality and Fostering Good Relations

Additional Equalities Data (Service Level or Corporate)

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above? The policies will ensure that newly created housing stock is allocated on a priority basis that creates the maximum amount of housing opportunities within our current housing stock by creating voids. The City Corporation's Housing Allocations Policy will continue to govern our overall approach to housing allocations, and the application of these policies to the new build properties will not alter this. This will have a positive impact on all protected characteristics as set out in the Equality Act 2010.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above?

It is not anticipated that these policies will have a negative impact on the advancing of equality or fostering good relations.

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 the 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.

Check this box if NOT applicable

Additional Impacts on Social Mobility

Additional Social Mobility Data (Service level or Corporate)

Are there any additional benefits or risks of the proposals on advancing Social Mobility?

The policies will promote equality of opportunity and prevents unlawful discrimination that would have an adverse impact on the advancement of social mobility.

What actions can be taken to avoid or mitigate any negative impact on advancing Social Mobility not considered above?

It is not anticipated that these policies will have a negative impact on the advancing of social mobility.

This section seeks to identify what additional steps can be taken to promote the aims or to mitigate any adverse impact on social mobility. This is a voluntary requirement (agreed as policy by the Corporation) and does not have the statutory obligation relating to protected characteristics contained in the Equalities Act 2010. Analysis should be based on the data you have available on social mobility and the access of all groups to employment and other opportunities. In addition to the sources of information highlighted above – you may also want to consider using:

- Social Mobility employment data
- Generic or targeted social mobility consultation results or research that is available locally, London-wide or nationally
- Information arising from the Social Mobility Strategy/Action Plan and the Corporation's annual submissions to the Social Mobility Ind

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 are no identified negative impacts because of this policy. The application of these policies will have a positive impact alleviating the housing need of some of our most vulnerable residents by allocating properties based on need, whilst creating the maximum number of new voids for residents waiting on our Housing Register or those currently living in unsuitable accommodation.

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 adjustment 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 be in line with the duty to 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:

Click or tap here to enter text.

Name: *Scott Myers*

Date *14/10/2022*