

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 approval and implementation of a Tenancy Policy. The policy document will broadly cover resident's rights and responsibilities relating to their tenancy with the City of London Corporation. 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 one for publication. 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
- Relatives of current tenants including joint tenants, the tenant's spouse or civil partner, 'common law' partner, parents, grandparents, children, grandchildren, siblings, uncles, aunts, nephews and nieces.
- Applicants who are currently on the Housing Register.
- Those who become our tenants via Mutual Exchange.

These tenants or relatives of 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*

Type response here

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***

Those directly affected by the policy will be over the age of 18, as tenancies may only be granted to those over 18. For those over 18, age will have no bearing on the application of the policy.

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

In order to mitigate any negative impact on those under 18, where a potential successor is under 18, arrangements will be put in place to hold the tenancy in 'trust' until the child reaches 18 and can take on the tenancy.

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*

Type response here

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***

For existing tenants, if there was an urgent need to move caused by a disability, this would be supported by the City's existing Allocations Policy.

Within this policy, those succeeding to a property that has been designed or adapted for the needs of a disabled person, and the successor has no such requirements, will be required to move to alternative accommodation.

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

Whilst successors may feel the approach requiring them to move has a negative personal impact, the policy approach is designed to mitigate against the negative impact of those with adapted property needs waiting for long periods of time for suitable properties to become available.

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.*

Type response here

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***

The Tenancy policy does not directly impact upon pregnancy and maternity. However there are two clear situations where these characteristics may be relevant.

Firstly, pregnancy and maternity is relevant in relation to succession when determining the appropriate property size for the household when a household is required to move home.

Secondly, pregnancy and maternity may be a relevant factor in the ending of a joint tenancy. As set out in the policy, the onus is on tenants to decide or get legal advice to determine which joint tenant retains the tenancy. If a case is raised, the court will take the factor of children into account when deciding.

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

In relation to succession, in order to mitigate the negative impact of a property being allocated to an under-occupying household, the child will only be taken into consideration once born.

Should a court be asked to determine the recipient of the tenancy the City has no influence on the matter and will enact the order.

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

Check box if NOT applicable

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](#)

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](#)

Religion or Belief

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

Type response here

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***

It is recognised that residents may wish to change their name for reasons of religion or belief. The policy allows for name changes for any reason of the resident’s choosing, subject to appropriate evidence being provided.

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.

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*

Type response here

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?

Sex	
The proposal has been developed to advance equality by recognising same-sex couples equally to opposite-sex couples in relation to succession and assignment.	No further action required.

Sexual Orientation and Gender Reassignment [Double click here to add impact / Hide](#) Check box if NOT applicable

Key borough statistics – suggested sources include: <ul style="list-style-type: none"> 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”.
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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*
Type response here

What is the proposal’s impact on the equalities aims? <i>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</i> The proposal has been developed to advance equality by recognising same-sex couples equally to opposite-sex couples in relation to succession and assignment.	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.
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Marriage and Civil Partnership [Double click here to add impact / Hide](#) Check box if NOT applicable

Key borough statistics - sources include: <ul style="list-style-type: none"> 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”.
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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*
Type response here

What is the proposal’s impact on the equalities aims? <i>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</i> The policy allows for joint tenancies between partners regardless of marital status.	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.
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Marriage and Civil Partnership

Where there is a sole tenancy, the tenant's partner will be the recipient of the succession right, over and above other family members, regardless of marital status.

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?

The Tenancy policy will foster good relations by presenting the City's approach in a transparent way. A resident leaflet will also be produced which presents the information in an easy-to-read format. The City's intention is to comply with the law and offer a fair service.

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.

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...

Type response here

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:

