

# Equality Analysis (EA)

## Section 1 – General Information (Aims and Objectives)

Name of the proposal including aims, objectives and purpose:

### **2016/18 Overcrowding and Under Occupation Plan**

The purpose of the Plan is to set out a plan to reduce overcrowding, assist under occupiers to move into smaller accommodation and improve the living conditions of thousands of families.

This will in turn improve the health and wellbeing for all households and the educational prospects of children, currently living in overcrowded conditions.

The delivery of the actions in the Plan will contribute to more sustainable communities by enabling households to live in suitable housing in the long term and reduce the numbers of households inadequately housed who are on the Common Housing Register.

It should be noted that the households of the majority of people who are impacted by the Overcrowding and Under Occupation Plan will need to join the Common Housing Register scheme and be assessed for rehousing.

The purpose of Common Housing Register Allocation Scheme is to set out the order of priorities for allocating a limited supply of housing to the substantial number of applicants on the Housing Register.

Overcrowded Households are currently placed in Priority Band 2 by date order.

Under occupying households are currently placed in Priority Band 1b. Those giving up the most bedrooms are considered first.

The scheme was subject to a review in 2012/13 following the enactment of the Localism Act and a revised scheme was approved by Cabinet in April 2013. The scheme was subject to a comprehensive Equalities Assessment which can be viewed here:

<http://modern.gov.towerhamlets.gov.uk/ieListDocuments.aspx?CId=320&MId=3755&Ver=4>

### **Who is expected to benefit from the proposal?**

Primarily overcrowded households, although under occupying households who can be rehoused into suitable more affordable accommodation will also benefit.

Service area:

### **Development and Renewal**

Team name: **Housing Strategy Team**

Service Manager: **Martin Ling**

Name and role of the officer completing the EA:

**Martin Ling – Housing Strategy Manager x0469**

## **Section 2 – Evidence (Consideration of Data and Information)**

What initial evidence do we have which may help us think about the impacts or likely impacts on service users or staff?

### **Statistics covering housing demand in the Borough including:**

Housing Waiting list broken down by need  
Data on overcrowding  
Data on underoccupation  
Data on medical need  
Data on race of applicants for social housing  
Population and census projections  
National and regional data and research on overcrowding

Data from the 2011 Census and the Council's Common Housing Register demonstrate high levels of overcrowding across all sectors and in particular the social rented housing sector. Over 7000 households on the Common Housing Register require at least one extra bedroom.

The data shows that families with children and in particular those from ethnic minority groups are most likely to be affected.

There are over 1000 households who are under occupying property in the social sector who have registered for a priority transfer on the Common Housing Register.

## **Section 3 – Assessing the Impacts on the 9 Groups**

### **How will what you're proposal impact upon the nine Protected Characteristics?**

For the nine protected characteristics detailed in the table below please consider:-

- **What is the equality profile of service users or beneficiaries that will or are likely to be affected?**

-Use the Council's approved diversity monitoring categories and provide data by target group of users or beneficiaries to determine whether the service user profile reflects the local population or relevant target group or if there is over or under representation of these groups

- **What qualitative or quantitative data do we have?**

-List all examples of quantitative and qualitative data available

*(include information where appropriate from other directorates, Census 2001 etc)*

-Data trends – how does current practice ensure equality

- **Equalities profile of staff?**

-Indicate profile by target groups and assess relevance to policy aims and objectives e.g. Workforce to Reflect the Community. Identify staff responsible for delivering the service including where they are not directly employed by the council.

- **Barriers?**

-What are the potential or known barriers to participation for the different equality target groups?  
Eg, communication, access, locality etc

- **Recent consultation exercises carried out?**

-Detail consultation with relevant interest groups, other public bodies, voluntary organisations, community groups, trade unions, focus groups and other groups, surveys and questionnaires undertaken etc. Focus in particular on the findings of views expressed by the equality target groups. Such consultation exercises should be appropriate and proportionate and may range from assembling focus groups to a one to one meeting.

- **Additional factors which may influence disproportionate or adverse impact?**

-Management Arrangements - How is the Service managed, are there any management arrangements which may have a disproportionate impact on the equality target groups

- **The Process of Service Delivery?**

-In particular look at the arrangements for the service being provided including opening times, custom and practice, awareness of the service to local people, communication

Please also consider how the proposal will impact upon the 3 One Tower Hamlets objectives:-

- Reduce inequalities
- Ensure strong community cohesion
- Strengthen community leadership.

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	<b>Impact – Positive or Adverse</b>  What impact will the proposal have on specific groups of service users or staff?	<b>Reason(s)</b> <ul style="list-style-type: none"> <li>• Please add a narrative to justify your claims around impacts and,</li> <li>• Please describe the analysis and interpretation of evidence to support your conclusion as this will inform decision making</li> </ul> <p>Please also how the proposal will promote the three One Tower Hamlets objectives?</p> <p>-Reducing inequalities -Ensuring strong community cohesion -Strengthening community leadership</p>
Race	<b>Positive</b>	<p>People of Asian heritage make up over 56% of those on the CHR at just under 57% People classified as “white” make up just under 22.5% and people categorised as Black are the 3rd largest group at 11.6%</p> <p>Some ethnic minority groups can therefore be affected by overcrowding, particularly Bangladeshi and other BME households as they can have larger than average households, both by the number of children, and the adults within the extended family.. These ethnic groups are also more likely to experience other forms of housing need such as homelessness.</p> <p>By taking forward the actions in the plan, primarily by giving these households greater priority on the Common Housing Register, building new family homes and carrying out adaptations to existing properties, the needs of these households can be better met.</p>
Disability	<b>Positive</b>	<p>Many overcrowded households also contain disabled members. The general purpose of the plan will be to rehouse or adapt the property of these households in order to alleviate the negative impact of living in overcrowded conditions.</p> <p>The plan sets out a specific action in relation to meeting the needs of households who include a disabled member. The Council has developed ‘Project 120’ by finding the best solution for all applicants on the housing register requiring wheelchair accommodation. It is called Project 120 as that was the original number identified when the project was launched. Many of these households are also overcrowded. To complement existing initiatives, a series of bespoke housing solutions are worked up for that group of</p>

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		<p>households who require Wheelchair Adapted/Mobility Standard A properties. Under Project 120 each household's physical needs are assessed alongside their other housing preferences – location, size, type, etc. The initial target is to identify a suitable property and make an offer to all those identified in the first two years of the project.</p> <p>Overcrowding can also have a negative impact on mental health with poor and overcrowded conditions leading to stress and depression. Rehousing people who are suffering from mental health issues can help alleviate their suffering.</p>
Gender	<b>Positive</b>	<p>A proportion of households who are overcrowded will be headed up by single parents, the majority of whom will be headed up by a woman.</p> <p>By taking forward the actions in the plan, the needs of these households can be met and the impact of the plan will have a positive impact.</p>
Gender Reassignment	Neutral	<p>There is data not currently available on the number of either overcrowded or under occupying households containing a member with gender reassignment. Rehousing applications are assessed based on need regardless of gender reassignment. Therefore, no impacts are considered likely.</p>
Sexual Orientation	Neutral	<p>Detailed statistical information on the LGBT community within LBTH is very limited. Estimates for the size of the LGB community in London range between 10% to 25% of London's population. (DTI 2004 Final Regulatory Impact Assessment: Civil Partnership). Rehousing applications are assessed based on need regardless of sexual orientation. Therefore, no impacts are considered likely.</p>
Religion or Belief	Neutral	<p>Based on the community profile it is estimated that people of Muslim faith make up approx. 36% - 55% of applicants on the Common Housing Register. The proposed plan is not deemed to be discriminatory or represent a barrier to any group of people based on their faith or belief.</p>
Age	Positive	<p>The Plan can have a positive impact on households which contain people of all ages. It should be noted that overcrowding can have a serious impact on the educational chances of young people who can be denied the space and quiet environment to study. By</p>

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		<p>relieving overcrowding, these young people can have the opportunity to improve their educational chances.</p> <p>Older persons are more likely to be under occupying as their families will have grown up and left home. By enabling these households to move into smaller more manageable and possibly more affordable accommodation, these households can also benefit.</p>
Marriage and Civil Partnerships.	Neutral	The plan does have any specific actions in relation to marriage or civil partnerships.
Pregnancy and Maternity	Positive	<p>A proportion of households who are overcrowded may contain a pregnant woman who may require either already or when the child is born require additional living space.</p> <p>By taking forward the actions in the plan, the needs of these households can be met and the impact of the plan will have a positive impact.</p>
Other Socio-economic - Households on low incomes	.Positive	<p>Under occupying households can lose up to 25% of their Housing Benefit following the introduction of the Social Sector Size Criteria (SSSC), on April 1<sup>st</sup> 2013. These households will be on very low incomes and could face further financial hardship if they are to meet the shortfall in rent from their other benefits entitlements.</p> <p>As at December 2015, 2,106 LBTH households affected of whom 1,590 are Registered Provider tenants and 516 are Tower Hamlets Homes tenants. 324 in receipt of DHP (15%)</p> <p>Actively assisting these households to move to smaller suitable properties where benefits will fully cover their housing costs could reduce the chances of these households facing financial hardship.</p> <p>Carers who live in overcrowded households will suffer the same problems as the rest of households and conditions could impact the ability of carers to assist effectively within these households can be enhanced.</p>
Carers		

#### Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence of or view that suggests that different equality or other protected groups (inc' staff) could have a disproportionately high/low take up of the new proposal?

No

*(Please note – a key part of the EA process is to show that we have made reasonable and informed attempts to mitigate any negative impacts. AN EA is a service improvement tool and as such you may wish to consider a number of alternative options or mitigation in terms of the proposal.)*

It should be noted that the majority of people who are impacted by the Overcrowding and Under Occupation Plan will need to join the Common Housing Register scheme and be assessed for rehousing.

The purpose of Tower Hamlets Common Housing Register Allocation Scheme is to set out the order of priorities for allocating a limited supply of housing to the substantial number of applicants on the Housing Register.

The fact that there is a limited supply of housing compared to the substantial number of applicants on the Housing Register means that not all households, particularly those with lower priority can be helped.

However as set out in the Equalities Assessment for the Common Housing Register scheme, the criteria for prioritising applicants were subject to a full consultation.

#### Section 5 – Quality Assurance and Monitoring

Have monitoring systems been put in place to check the implementation of the proposal and recommendations?

Yes

How will the monitoring systems further assess the impact on the equality target groups?

The Overcrowding and Under Occupation plan will be monitored by the Tower Hamlets Housing Forum Common Housing Register sub group.

Does the policy/function comply with equalities legislation?

(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)

Yes

If there are gaps in information or areas for further improvement, please list them below:

None

How will the results of this Equality Analysis feed into the performance planning process?

The Council's Strategic Housing Team will take part in the monitoring of the Plan through the THHG group and feed the outcomes into the Development and Renewal Directorate performance planning process.

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**Section 6 - Action Plan**

*As a result of these conclusions and recommendations what actions (if any) **will** be included in your business planning and wider review processes (team plan)? Please consider any gaps or areas needing further attention in the table below the example.*

Recommendation	Key activity	Progress milestones including target dates for either completion or progress	Officer responsible	Progress
Monitoring of Action Plan	17 actions as set out in Action plan	Each action to be assigned milestones including target dates for either completion or progress.	D & R team members,	

**Section 7 – Sign Off and Publication**

<p><b>Name: Alison Thomas</b> (signed off by)</p>	
<p><b>Position:</b> Head of Housing Strategy, Partnerships and Affordable Housing</p>	
<p><b>Date signed off: 22/01/2016</b> (approved)</p>	

**Section 8 Appendix – FOR OFFICE USE ONLY**

This section to be completed by the One Tower Hamlets team

**Policy Hyperlink :**

<b>Equality Strand</b>	<b>Evidence</b>
Race	
Disability	
Gender	
Gender Reassignment	
Sexual Orientation	
Religion or Belief	
Age	
Marriage and Civil Partnerships.	
Pregnancy and Maternity	
Other Socio-economic Carers	

<b>Link to original EQIA</b>	<b>Link to original EQIA</b>
<b>EQIAID (Team/Service/Year)</b>	