

## Appendix 4: EQUALITY ANALYSIS QUALITY ASSURANCE CHECKLIST

<b>Name of 'proposal' and how has it been implemented</b> (proposal can be a policy, service, function, strategy, project, procedure, restructure/savings proposal)	<b>Proposed Article 4 direction for the removal of planning permitted development rights for the conversion of dwellinghouses to small houses in multiple occupation (HMOs)</b>
<b>Directorate / Service</b>	<b>Place</b>
<b>Lead Officer</b>	<b>Aleksandra Milentijevic</b>
<b>Signed Off By (inc date)</b>	<b>Marissa Ryan-Hernandez (01/11/2019) Paul Buckenham (01/11/2019)</b>
<b>Summary – to be completed at the end of completing the QA (using Appendix A)</b> (Please provide a summary of the findings of the Quality Assurance checklist. What has happened as a result of the QA? For example, based on the QA a Full EA will be undertaken or, based on the QA a Full EA will not be undertaken as due regard to the nine protected groups is embedded in the proposal and the proposal has low relevance to equalities)	<div style="display: flex; align-items: center; margin-bottom: 10px;"> <div style="width: 20px; height: 20px; background-color: green; margin-right: 10px;"></div> <div><b>Proceed with implementation</b></div> </div> <p>Based on this QA, the majority of people with shared characteristics will not experience any impact; however, the assessment found that there would be both positive and negative impact on certain people with shared characteristics.</p>

Stage	Checklist Area / Question	Yes / No / Unsure	Comment (If the answer is no/unsure, please ask the question to the SPP Service Manager or nominated equality lead to clarify)
<b>1</b>	<b>Overview of Proposal</b>		
a	Are the outcomes of the proposals clear?	Yes	The Article 4 direction would provide the opportunity for the Council to consider the impact of the creation of additional houses in multiple occupation (HMOs).

b	Is it clear who will be or is likely to be affected by what is being proposed (inc service users and staff)? Is there information about the equality profile of those affected?	Yes	The confirmation of the Article 4 direction would bring the direction into force and could positively and negatively affect both the existing and future population of the borough. The equality profile of the affected is provided in section 3a.
<b>2</b>	<b>Monitoring / Collecting Evidence / Data and Consultation</b>		
a	Is there reliable qualitative and quantitative data to support claims made about impacts?	N/A	The EqIA aims to assess the degree of impact on people with shared characteristics taking into consideration the available information.
	Is there sufficient evidence of local/regional/national research that can inform the analysis?	N/A	The degree of potential impacts is considered below, but it is not considered to be exhaustive.
b	Has a reasonable attempt been made to ensure relevant knowledge and expertise (people, teams and partners) have been involved in the analysis?	Yes	Public consultation and the previous Council's reporting cycle have allowed for an input from various stakeholders.
c	Is there clear evidence of consultation with stakeholders and users from groups affected by the proposal?	Yes	Formal consultation was carried out between 15 <sup>th</sup> August and 26 <sup>th</sup> September 2019. One representation raised concerns in relation to the impact of the Article 4 direction on the most vulnerable members of the society.
<b>3</b>	<b>Assessing Impact and Analysis</b>		
a	Are there clear links between the sources of evidence (information, data etc) and the interpretation of impact amongst the nine protected characteristics?	No	There is no evidence of impacts. The justification report identifies the overall impact of HMOs on the borough's population without differentiating population groups.
b	Is there a clear understanding of the way in which proposals applied in the same way can have unequal impact on different groups?	Yes	The proposed Article 4 direction would better manage HMOs in terms of their future occupiers' residential amenity by providing appropriate quality of living accommodation. The new management of HMOs has the potential to benefit the local community by reducing potential social and environmental adverse impacts that might rise from HMOs and their clusters, e.g. noise, waste, general upkeep etc. This would be a positive impact on people of all age (1).  The proposed Article 4 direction is neutral in terms of

		<p>disability (2), gender reassignment (3), pregnancy and maternity (4), race and ethnicity (5), religion or belief (6), sex (7) and sexual orientation (8).</p> <p>In terms of marital status (9), it is assumed that single people are more likely to be accommodated in HMOs and they would benefit from the proposed improvements to the living conditions. However, there might be a decreased provision of HMOs as a result of the proposed Article 4 direction which could negatively impact this group.</p> <p>Other key groups include people on lower incomes as they are likely to be accommodated within HMOs. Additional information is provided below. The Article 4 direction might result in fewer HMOs, albeit with improved quality, decreasing the provision of opportunities for such forms of low income housing.</p> <p><u>Welfare benefits claimants</u></p> <p>According to the Jobseeker's Allowance from September 2019<sup>1</sup>, there were 8,025 claimants in total. More than half of the claimants are in the age group 25-49.</p> <p><u>Unemployment</u></p> <p>The model-based information from Jul 2018-Jun 2019<sup>2</sup> indicates that there might be around 10,700 unemployed people in the borough.</p> <p><u>Young People</u></p> <p>More than half of the homelessness reported to the borough</p>
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<sup>1</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157257/report.aspx#tabwab>; accessed on 1<sup>st</sup> November 2019

<sup>2</sup> <https://www.nomisweb.co.uk/reports/lmp/la/1946157257/report.aspx#tabempunemp>; accessed on 1<sup>st</sup> November 2019


			<p>by single people came from those under 35, whilst just under a quarter who reported homelessness were aged between 18-25<sup>3</sup>. Tower Hamlets Housing Strategy 2016-2021 states that young people on low incomes who are unable to live in the family home face a number of difficulties accessing affordable alternative housing including within the private rented sector.</p> <p>It has been acknowledged that HMOs make contributions towards housing options for those on lower income including young people. However, this is dependent on a number of factors including location, quality and personal choice.</p>
<b>4</b>	<b>Mitigation and Improvement Action Plan</b>		
a	Is there an agreed action plan?	No	There is no agreed action plan in place.
b	Have alternative options been explored?	Yes	Yes, these are included in the main report.
<b>5</b>	<b>Quality Assurance and Monitoring</b>		
a	Are there arrangements in place to review or audit the implementation of the proposal?	Yes	The proposed Article 4 direction would be monitored through the planning register, i.e. the number of submitted planning application for the change of use from dwellinghouses to small houses in multiple occupation.
b	Is it clear how the progress will be monitored to track impact across the protected characteristics?	No	While the implementation of the proposed Article 4 direction will be monitored through the planning register, it is not clear how the impact on the people who share protected characteristics could be monitored.
<b>6</b>	<b>Reporting Outcomes and Action Plan</b>		
a	Does the executive summary contain sufficient information on the key findings arising from the	No	Yes. Whilst the executive summary looks at the overall impact of the Article 4 direction, it also acknowledges a

<sup>3</sup> Tower Hamlets Housing Strategy 2016-2021

	assessment?		potential impact on the people who share certain protected characteristics.
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## Appendix A

### (Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the QA checklist, it is evident that due regard is not evidenced in the proposal and / or a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share Protected Characteristics. It is recommended that the proposal be suspended until further work or analysis is performed – via a the Full Equality Analysis template	<b>Suspend – Further Work Required</b>	Red 
As a result of performing the QA checklist, the policy, project or function does not appear to have any adverse effects on people who share Protected Characteristics and no further actions are recommended at this stage.	<b>Proceed with implementation</b>	Green: 