

Equality Analysis (EA)

Financial Year

2020/21

See
Appendix A
Current decision



Section 1 – General Information (Aims and Objectives)

Intermediate Housing Policy

Following a review of the Council's Housing Allocations Scheme in 2019/20 and as an action arising from the Council's Housing Strategy 2016 – 2021, the Council is developing an Intermediate Housing Register of Interest to enable residents who are not a priority for social housing, but who are unable to afford market housing options within the Borough, to access affordable intermediate housing products in the Borough.

The development of an Intermediate Housing policy will underpin the new Intermediate Housing Register and provides a prioritisation scheme which ensures that residents are the first in line to benefit when new intermediate housing units are built in the Borough. This policy sets out the order in which these residents should be prioritised during the initial first three months of marketing any new intermediate housing projects (e.g. shared home ownership and Intermediate Rent homes. The Council expects our partners to use this when prioritising applicants for products such as the London Living Rent on the Borough's Intermediate Housing Register.

Until now, the Council has not formalised how it will prioritise applicants for Intermediate Housing. Where intermediate homes for sale or rent are partly or fully funded by the Greater London Authority (GLA), all London local authorities are required to have policies that are in general conformity with the Mayor's London Plan and Housing Strategy. Both documents set out the GLA's eligibility criteria for intermediate housing, including income caps which are updated yearly in the London Plan Annual Monitoring Report which are based primarily on household incomes.

In line with the rules set out in the GLA's Capital Funding Guide, (which details the eligibility requirements for any intermediate housing products that are fully or partially funded by the GLA), local authorities can set their own local eligibility criteria for a three-month marketing period based. This should not start earlier than 6 months before practical completion, with eligibility widening out to the London-wide criterion specified by the GLA which is triggered at the end of the initial three-month marketing period.

In all other respects, the Council's eligibility criterion for accessing Intermediate Housing mirrors that set by the Mayor of London.

There is a real need within the Borough to increase interest in and promote intermediate housing as alternative housing options within the Borough, and demand far-outstrips supply for social and affordable rented homes, exacerbated by the decrease in the Council's housing stock as a result of the Right to Buy Scheme and the challenges around affordability in the housing market across the Borough.

As at 1st April 2020, there were 20,073 applicants on Tower Hamlets' Common Housing Register. The largest housing tenure within the Borough is the private rented sector - 39% of the total housing stock in Tower Hamlets is privately rented. The average cost of a property in the Borough is more than 14 times (£450,000) what a typical essential worker could earn in wages (£35,000). The average rent in Tower Hamlets is £1,647 compared to £695 nationally. This illustrates that the demand for affordable housing is real and it is in the Council's interests to ensure that our residents on low to medium household incomes receive the first opportunity to Intermediate Housing products as they become available in the Borough.

What is Intermediate Housing?

The term 'intermediate housing' describes a range of homes for sale and rent provided at a cost above social rent, but below market levels. This is subject to the criteria in the National Planning Policy Framework's affordable housing definition. These homes can include shared equity (shared ownership

and equity loans), other low-cost homes for sale and intermediate rent, but not affordable rent.

Intermediate Housing Products are targeted at those applicants who have difficulty entering or moving within the housing market, typically this will be residents who are on low to median household incomes. These households may also have difficulty in affording rent in the private rental sector or are unable to purchase a home with a mortgage. It is the Council's intention to promote and steer residents who are not in priority housing need towards intermediate housing products.

Local prioritisation for the initial three months of marketing new Intermediate Housing projects

The Council proposes to restrict applications during the first 3 months of marketing of a new intermediate housing project to the following applicants:

- a) Existing social housing tenants (living in accommodation owned by the Council or a Registered Provider as registered pursuant to Sections 111-115 Housing and Regeneration Act 2008 in Tower Hamlets and wholly releasing accommodation which the Council has nomination rights to.
- b) Armed Forces personnel (serving military personnel and former members of the British Armed Forces discharged within the last 2 years).¹
- c) Tower Hamlets Residents
- d) Non-Tower Hamlets' residents who have been working in the Borough for the past six months

Applicants within each band will be prioritised according to the date of their registration on the Intermediate Housing Register of interest. In the instance where there is a tie between two applicants within a priority banding, priority will be given to the applicant/household on the lowest income.

However, each scheme will have its own valuation and costs. Applicants will be required to demonstrate that they are able to afford the property – Registered providers and developers will need to screen applicants to ensure that applicants are able to afford the property.

The local prioritisation matrix must be applied during the first initial three-months of marketing all new Intermediate Housing Schemes built within the Borough, regardless of whether the schemes have been developed with or without any GLA or Government financial support/funding.

The same priority matrix will be applied to intermediate homes which are brought forward as London Living Rent (LLR). Where there is more than one eligible applicant, providers should determine priority via the Intermediate Housing Register, by using the priority group or groups identified by the Council (as specified in the GLA's 'Affordable Housing and Viability Supplementary Planning Guidance' published in August 2017).

The introduction of the Intermediate Housing Register meets a commitment set out in the Council's Housing Strategy (2016-2021) to develop and promote Affordable Housing within the Borough through the creation of an Intermediate Housing Register.

¹ Priority is awarded to Armed Forces personnel (serving military personnel and former members of the British Armed Forces discharged in the last 2 years), and bereaved spouses/civil partners where the death was partly attributable to their service. The group includes armed forces personnel who have completed basic (phase 1) training and who fall into one of the following categories:

- Regular service personnel (including Military Provost Guards Service in the Army, Navy, Air Force)
- Clinical staff (excluding doctors and dentists)
- MoD police officers
- Uniformed staff in the Defence Fire Service
- Ex-regular service personnel (who have served in the Armed Forces for a minimum of six years and can produce a Discharge certificate, or similar document).

Applications must be within 12 months of discharge. The surviving partners of regular service personnel who have died in service may be eligible to be prioritised where they apply within 12 months of the date of being bereaved

Under the Equality Act 2010, the Council must have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- Advance equality of opportunity between those with a protected characteristic and those without;
- Promote good relations between those with a protected characteristic and those without.

The 'protected characteristics' referred to are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; gender, sexual orientation. It also covers marriage and civil partnerships. The intention of this equalities assessment is to give consideration of the proposed change to Band 3 of the Common Housing Register under the Council's Allocations Scheme regarding each protected characteristic to ensure that any discrimination or adverse impact is mitigated. In addition, the Council also considers the socio-economic impact on the community.

This equalities impact assessment looks at the impact of the proposed policy on the protected groups and suggests appropriate mitigation actions where necessary.

Conclusion - To be completed at the end of the Equality Analysis process

The Intermediate Housing Policy sets out the priority matrix which registered providers and developers should regard when considering applications for Intermediate Housing units during the initial first three months of marketing any new units developed in the Borough. It will ensure that our residents get the first opportunity to be considered for these homes before these homes are offered out to a wider London based applicant source.

This Equality Analysis has demonstrated that residents who identify with any number of the protected characteristics will not be adversely or negatively impacted by the adoption of a localised priority matrix during the initial three-months of marketing any new Intermediate Housing schemes in the Borough.

Name: Karen Swift, Divisional Director of Housing & Regeneration.
(signed off by)

Date signed off: 20th January 2021
(approved)

Service area: Housing & Regeneration

Name and role of the officer completing the EA: Una Bedford, Strategy and Policy Officer (Place)

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?

At present, Band 3 of the Common Housing Register permits applicants who are adequately housed but not in priority housing need to join the waiting list for social housing in the Borough.

Data from the Common Housing Register (1st April 2020) shows the tenure types of applicants within Band 3.

Tenure	
Social housing tenancy (Transfer applications)	2,760 (33%)
Living with friends and family	3,094 (37%)
Renting privately	2,034 (24%)
Others (lodges, hostels or tied accommodation)	563 (6%)

The data demonstrates that there are a considerable number of residents considered adequately housed and not in priority need - typically those residents who live with family or friends and those who rent their home privately - who need to find an alternative affordable housing solution.

Lettings to Band 3 applicants make up a small percentage of the overall churn in the Borough's social housing stock. Data from the last financial year, (April 2019 to March 2020), reveals that during this period from a total of 1,862 social housing lets were made from which 93 properties (5% of all social housing lets) have been let to Band 3 applicants.

Similarly, data from the financial year 2018/19 demonstrated that a total of 1,329 social housing homes were let to Band 3 applicants; only 5.9% of these lets (79 units) went to applicants in Band 3. From these units, 50 were designated as accommodation for applicants over 50 or as sheltered accommodation.

Again in 2017/18, 1,680 social housing homes were let, and a total of 90 units went to Band 3 applicants (5.3%). This not only confirms that the majority of available lets go to applicants in Band 1 and 2 with priority housing need but also from the few lets which become available to applicants in Band 3 applicants, the majority of lets are predominately going to those residents aged 50+.

During November 2019 – February 2020, a public consultation was held on changes to the review of the Council's Allocations Scheme. From the responses received, particularly from those who live with family or friends or private renters in the Borough, the desperation and sense of futility of applicants in Band 3 resounded clearly.

In creating an Intermediate Housing register of interest for Intermediate Housing products, with the Council exercising its discretion to apply a local prioritisation matrix, it is envisaged that this will widen the choice of housing available to residents who may have the financial means to move into more affordable housing. This Intermediate Housing Policy underpins the local prioritisation which the Council wishes to employ for our residents and will offer guidance to registered providers and developers who market these homes as to how to place our residents as the first in line for any new Intermediate homes which become available in our Borough.

The Council remains committed to increasing the supply of council homes and its programme of building. Although progress is being made, the level of demand for social housing will never be met as it far outstrips supply. Where possible, the Council aims to utilise other housing options for residents which include the promotion of Intermediate Housing Products for those residents who are considered adequately housed and without priority need. These possibilities will be promoted and encouraged actively by the Council's Housing Options Team.

The introduction of an Intermediate Housing Register of interest for affordable housing schemes in the Borough, may provide a first step towards home ownership for those residents who have the financial means to seek an affordable route to home ownership as an alternative to social housing. It will also help those who are living with parents or relatives or those who rent privately into affordable rent and again towards staircasing towards their owning their own home, freeing up the housing possibilities for residents in the Borough.

For staff, the policy will require minimal training to ensure that those who provide housing options advice can direct residents towards the Intermediate Housing Register explaining the implications and eligibility criterion clearly to residents. The Council's IT systems and Home seekers webpage will need to be updated and expanded to allow those seeking housing advice to 'self-serve' in order to access intermediate housing products as they become more widely available within the Borough.

The Council will procure and develop an IT application which registered providers and developers can use as an Intermediate Housing Register. This will not only provide a mechanism of ensuring 'first dibs' to local residents but will provide a further marketing tool to enable and widen the pool of local applicants who have expressed an interested in intermediate housing products.

Section 3 – Assessing the Impacts on the 9 Groups

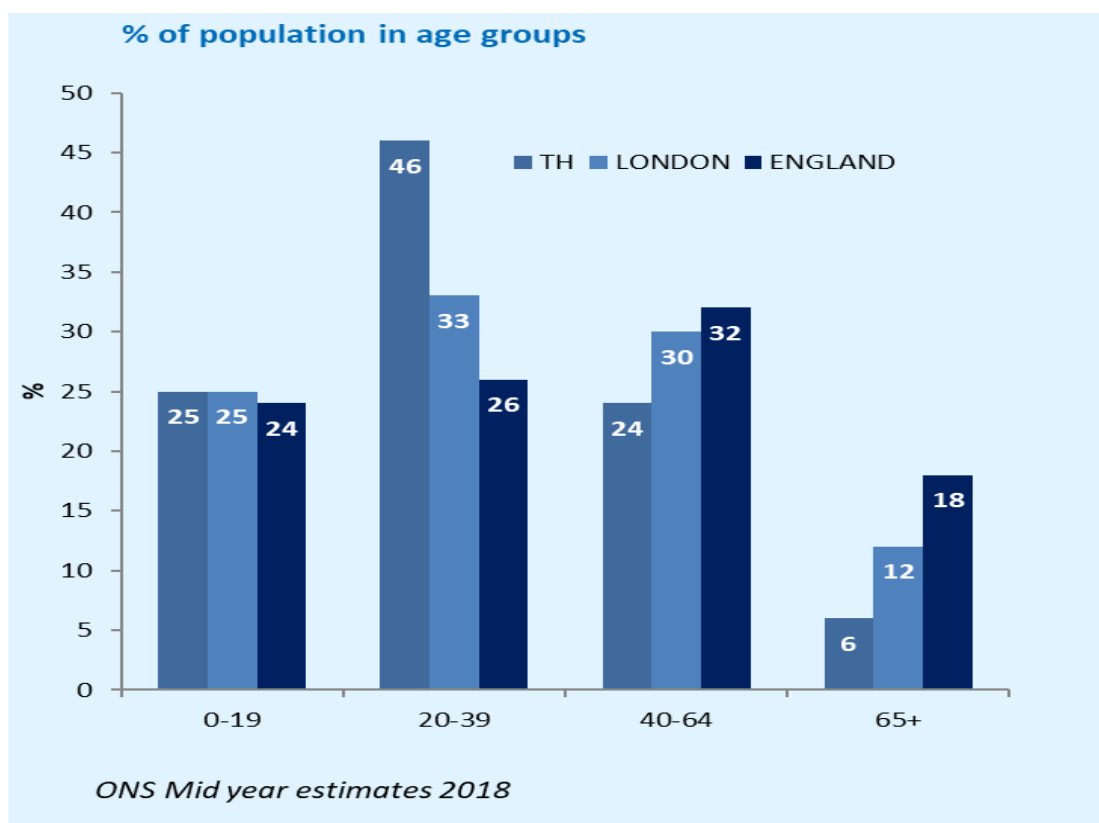
1) Age

Tower Hamlets has a similar proportion of young people aged 0-19 when compared to England and London. One in four (25%) of the Borough's residents are in this age group. The largest age group is the 20-39-year olds. Approximately 46% of the population are aged 20-39. This is higher than London (33%) and England (26%).

England has an older population when compared to Tower Hamlets and London. Only 6% of the Borough's population are aged 65+ compared to 12% in London and 18% in England.

Tower Hamlets has a relatively young population compared with the rest of the country. Our median age in 2017 was 31.0 years which was the 4th youngest median age out of all local authorities in the UK. The median age was 35.1 in London (4.1 years older), 39.8 in England (8.8 years older) and 40.1 in the UK (9.1 years older).

The figure below shows the difference between the age profiles in Tower Hamlets compared to the rest of London and compared to England. aged 20-39, the highest proportion in the UK, and well above the London average (34 per cent).



The Borough's relatively young age profile reflects the fact that over the past ten years, the Borough's working age population has increased much more quickly than the child population or older age groups. In addition, nearly eight in ten (77%) residents who have lived in the Borough for less than 5 years are aged between 18 and 34, and 88% of our economic migrants in 2017/18 were aged 18 to 34.

While the Borough's population is projected to age slightly in the coming years, it is expected to retain its distinctive young population.

This policy is considered to have a positive impact on residents regardless of their age.

Younger residents are more likely to experience difficulties with their housing costs and are over-represented within the private rented sector. Younger people are finding it increasingly difficult to get on the housing ladder, having to remain longer with parents or in expensive private rented accommodation.

A significant proportion of household incomes within the Borough are spent on meeting housing costs in the private rented sector. The private rented sector is the largest housing tenure within the Borough (39%). Younger people have less money to save up for a deposit to purchase a home on the open market, limiting their ability to access home ownership. The creation of an Intermediate Housing Register and supporting policy will encourage access to Intermediate Housing products among younger residents on lower to medium incomes.

Intermediate housing may also be more suitable for younger people, because of their aspirations of home ownership – something that may be more viable for those able to take out a mortgage over an extended period.

Older people are less likely, and may be more reluctant, to access Intermediate Housing products. Anecdotally, older residents have found it increasingly more difficult to obtain finance to secure a mortgage on shared ownership products. They may however be able to benefit by being able to afford a lower share in a property but maybe limited in terms of the time over which they take out a mortgage in order to purchase a property outright.

Demand for intermediate rent products amongst older people is not clear, but intermediate housing could play a greater role in housing older people in future – by enabling downsizing.

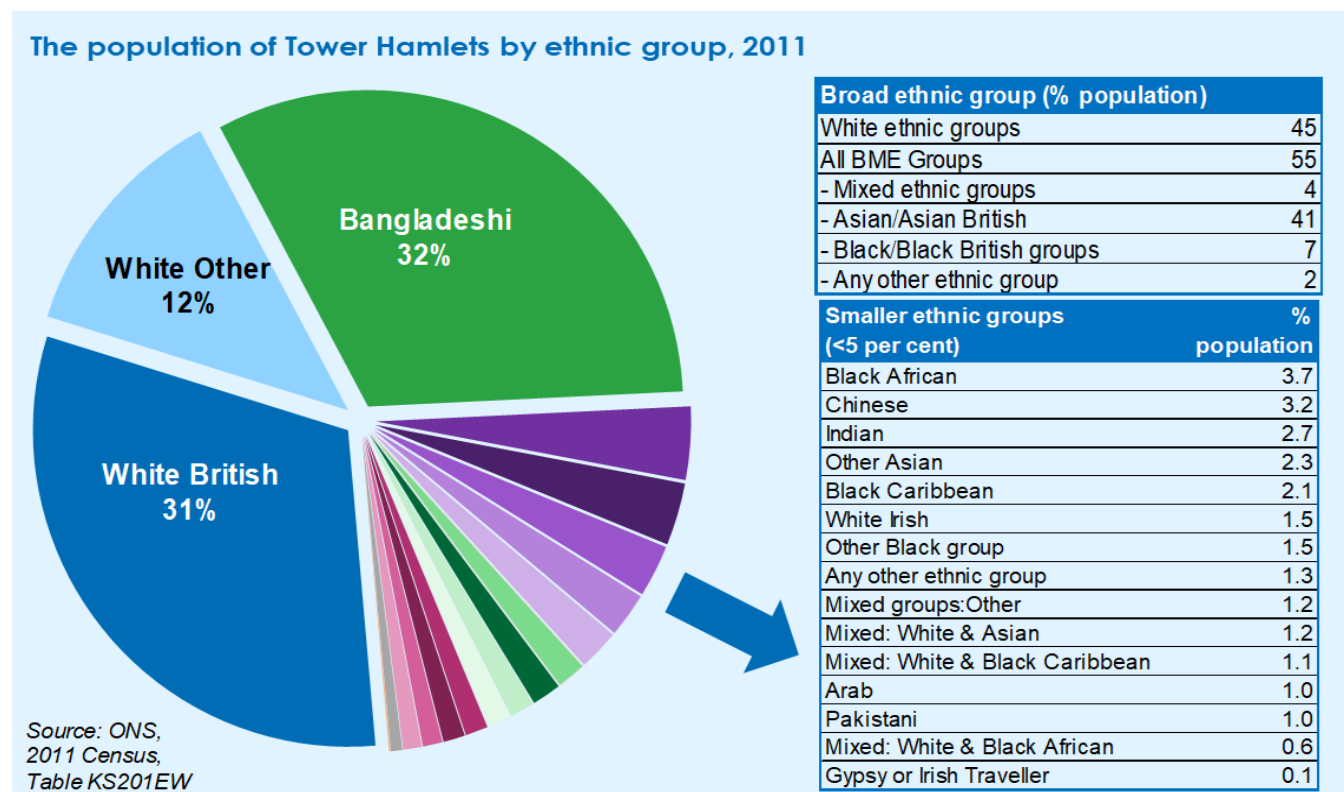
Applicants who live with their parents will also benefit from the Council exercising its discretion to prioritise Borough's residents during the first three months of marketing new Intermediate Housing schemes. Within the cohort of initially prioritised applicants for new intermediate homes, there will be adult children residing with existing social housing tenants who may have the financial means and meet the other eligibility criterion to access Intermediate Housing. If the adult children who reside with existing social housing tenants are able to move into their own accommodation it may provide existing social housing tenants the opportunity to down-size or relinquish a tenancy that no longer meets their housing needs and enable the existing tenants to move to more suitable accommodation, in turn freeing up much needed social housing stock in the Borough.

While Intermediate housing products are intended to be for first time buyers, there is scope to allow existing residents, (current leaseholders and home owners), who have purchased a council property under the Right to Buy, who are being decanted as a result of regeneration or redevelopment) and cannot afford to purchase a property on the open market to access any new intermediate shared ownership projects in the initial marketing period. These applicants will be compensated through the Home Loss or/or Disturbance Allowance Payments and may seek to use this compensation towards a share in a new home, particularly where the value of the property has depreciated and when combined with any compensation, means they are unable to purchase a new home outright on the open market.

The new Intermediate Housing Register of interest will give residents, irrespective of any protected characteristic that they identify with, priority for the initial three months of any new scheme being marketed. This will provide residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

2) Race

More than two-thirds, (69%) of the Borough's population, belong to a minority ethnic group. Tower Hamlets is ranked as the 16th most ethnically diverse local authority in England out of 325 local authorities.



The Borough's two largest ethnic groups are the White British and the Bangladeshi populations, each accounting for one third of the population. Tower Hamlets has the largest Bangladeshi population in the country.

The third largest group is the White Other population, who account for 12% of the Borough's population. This group is diverse and includes residents from a mix of ethnic backgrounds, Europeans, Australians and Americans.

A significant proportion of the Borough's population are Somali. The 2011 Census identified 2,925 Somali-born residents, 1.2% of the population. The overall size of the Somali population in the borough, including subsequent and second generations, is considerably larger, between 6,000 and 9,000 or 2-3% of the population.

BAME residents are over-represented in data extracted on the ethnicity of social housing tenants. 78% of households on the Borough's Common Housing Register (CHR) across all priority bandings identify as BAME; 60% of households on the CHR identify as Asian. While data shows that residents who identify as BAME are often in the greatest housing need and experience considerable financial disadvantage in terms of housing affordability, the localised prioritisation of Tower Hamlets residents during the initial three months of marketing any new schemes in the Borough may encourage those who have the financial means but little chance of an offer of a social housing tenancy, an alternative form of affordable housing.

Borough profile data indicates that BAME households are more likely to experience poverty and be disproportionately affected by overcrowding. Around 40% of households on the CHR are living in overcrowded conditions. There are hidden households within households, where several generations of family co-exist under one roof.

Intermediate homes may also appeal to those who struggle to meet the costs of renting in the PRS. Black, Asian and minority ethnic (BAME) groups are more likely to experience poverty, are less likely to own their own home and are disproportionately affected by overcrowding. The introduction of a localised priority matrix for the initial three months of marketing new intermediate housing units in the Borough – could benefit these households and help to reduce this inequality and improve access to home ownership for this group.

The new Intermediate Housing Register of interest will give all residents priority for the initial three months of any new scheme being marketed. This will provide residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

3) Gender

Tower Hamlets has around 14,000 more male residents than female residents. This is the 5th highest ratio of males to females in the country and is higher than the ratio in both London and UK where there are more females than males.

The Borough has 52.2% male residents and 47.8% female residents (ONS mid-year estimates 2018).

Women are more represented than men in terms of housing need. Analysis of Band 3 of the CHR (as of 1st April 2020), confirms that there are 56% of female applicants compared to 43% male applicants who while assessed as adequately housed without priority need seeking social housing. While income data is obtained at the point at which an applicant applies for social housing, the use of income data is unreliable as households incomes may change over the duration of their time on the CHR (in order to be eligible to join the CHR, applicants must have a household income below £90,000 per annum). Household income data is only collected again in the time before an applicant is made a grant of a social housing tenancy.

Similarly, information from Tower Hamlets Homes (November 2019) indicates that females are the largest gender group among Council tenants with 56% of all council tenant's female. Males represent 34% of all tenancies. On the basis that there are more female led households among current council tenants and those already adequately housed but not in priority need, it could be argued that women are more likely to benefit from the Council's application of a local priority matrix for any new Intermediate Housing Schemes. The policy would increase affordable home ownership options in the Borough by offering council tenants the opportunity to purchase on a shared ownership basis where they cannot afford to purchase outright. However, when comparing the income status of women to men, their income status is the same.

Information from Tower Hamlets Homes (November 2019) shows that 81% of female tenants do not receive either a full or partial award of Housing Benefit. Only 19% of female council tenants had a full award of HB. The same data shows that 19% of male tenants receive the maximum award of Housing Benefit.

This policy will have a positive impact on all residents seeking to access intermediate housing irrespective of their gender.

4) Gender Reassignment (Gender Identity): No information is held on gender reassignment.

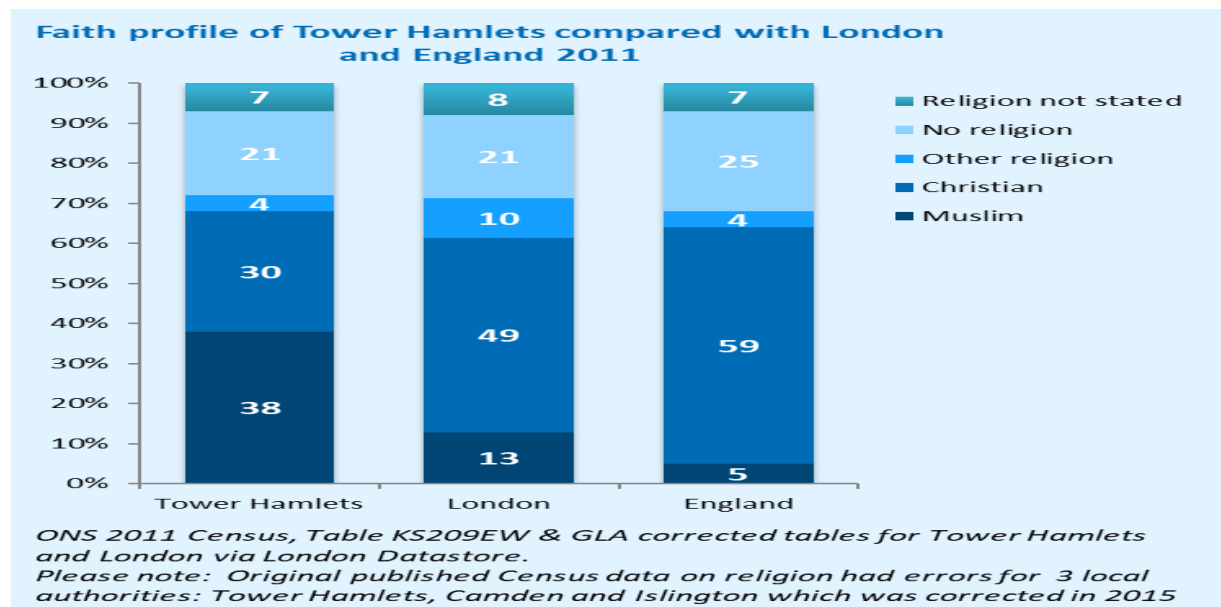
There is a lack of information on this protected characteristic, The Council does not make any distinction between applicants who are the same sex as they were assigned at birth, and those who are or have transitioned.

Applicants can choose whether to disclose this information as part of the Council's equalities monitoring process.

It is not thought that this policy will have a negative or disproportionate on residents who identify with this protected characteristic. The new Intermediate Housing Register of interest will give residents, irrespective of any protected characteristic that they identify with, priority for the initial three months of any new scheme being marketed. This will provide residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

5) Religion and belief

Tower Hamlets has the highest number of Muslim residents in the country. Around 38% of the residents are Muslim, compared with 5% in England and 13% in London. Conversely, the Borough has the lowest number of Christian residents (30%), compared with 59% in England and 49% in London.



The Council recognises that there will be Muslim applicants who will be unable to access home ownership via Intermediate Housing products. An applicant cannot use a Shariah mortgage to finance the purchase of a home through shared ownership or right to buy schemes. This is because Islamic home finance depends on the bank buying the home on the mortgager's behalf.

The charging of interest is forbidden under Islamic law, no lending or borrowing money. However, Help to Buy Schemes can be used by providers of home purchase plans and there are several banks and financial institutes which offer home purchase plans which are sharia compliant. The bank or institution purchase the property on behalf of the customer then lease or rent the property back to them, so the customer pays the mortgage back as rent, once the final instalment is paid, the property belongs to the customer.

Applicants who cannot apply for a conventional mortgage will be directed towards 'Help to Buy' products (through the Greater London Authorities webpage).

This policy is not thought to have a negative or disproportionate impact on residents who identify with a specific religion or faith. The new Intermediate Housing Register of interest will give residents, irrespective of any protected characteristics that they identify with, priority for the initial three months of any new scheme being marketed. This will provide residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

6) Sexual orientation

The information which is available on this protected characteristic is limited. Local authority level sexual identify experimental estimates published for 2013-15 estimate that 4.3% of the Tower Hamlets population identified as lesbian, gay or bisexual.

There is a deficit in the data held on the sexual orientation of residents within the Borough and residents are often reluctant to disclose this information. Applicants can choose if they wish to disclose this information.

The Office for National Statistics are proposing to include a question on sexual orientation in 2021. Experimental estimates published by ONS for 2017, show that nationally 2% of the UK population aged 16 and over identify as LGB, regionally, people in London (2.6%) are more likely to identify as LGB.

Any issues brought to our attention will be dealt with sensitively on a case by case basis. We recognise that this is an elective process on the part of the tenant and the Council respects the confidence given to our officers when a tenant discloses this information to use.

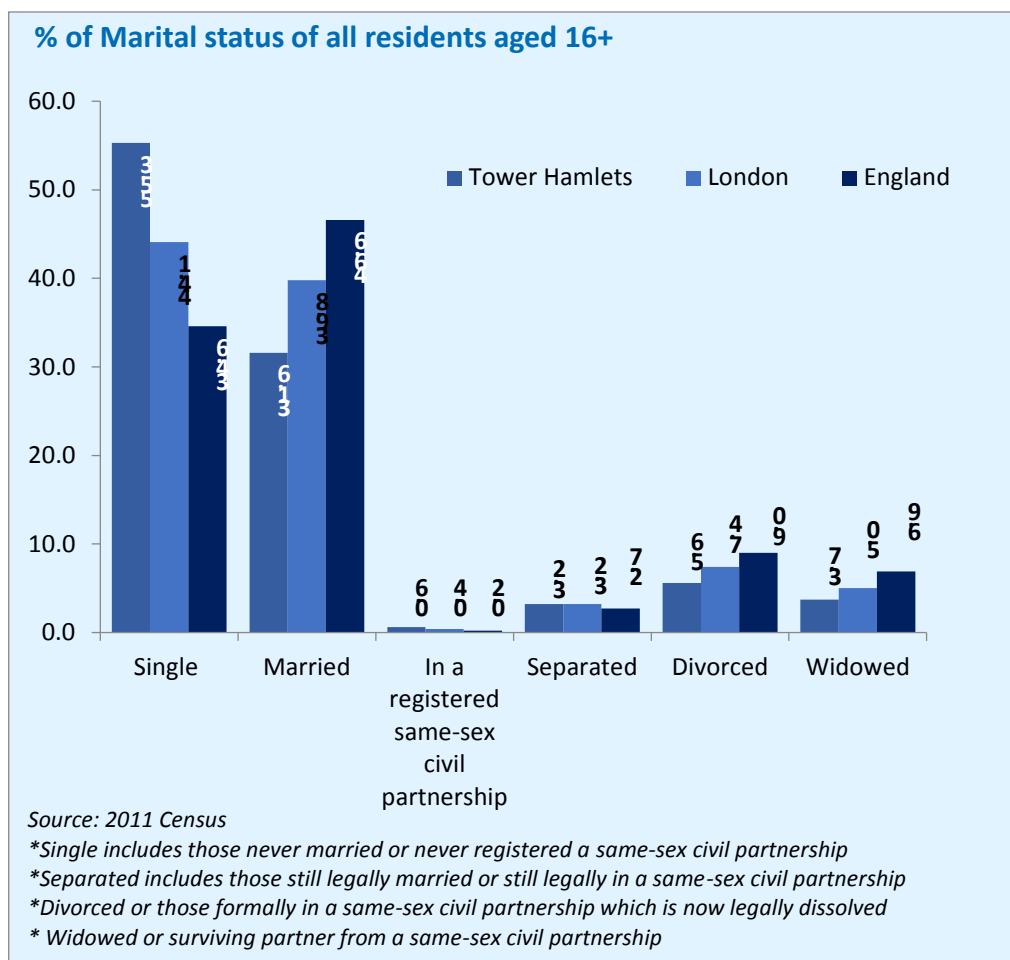
It is not thought that the Intermediate Housing Policy will have a disproportionate or negative impact on residents who identify with this protected characteristic.

The new Intermediate Housing Register of interest will give residents, irrespective of any protected characteristics that they identify with, priority for the initial three months of marketing any new scheme developed within the Borough. This will provide residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

7) Marriage and Civil Partnerships

The most recent data held on the marital status of residents in the Brough is from the 2011 Census. Tower Hamlets has significantly higher proportion of residents who are single compared to London and England. In 2011, 55.3% of residents were single, compared to 44.1% in London and 34.6% in England.

Nationally 46.6% of those aged 16 and over are married, compared to 39.8% in London and 31.6% in Tower Hamlets.



It is thought that this policy could have a positive impact by encouraging families with the financial means to move to a larger home, which are typically more expensive on the open market. This in turn can prevent overcrowding and reduce the anxiety and stress which the lack of affordability in the private rented sector may have.

All residents will benefit from the introduction of an Intermediate Housing Register of interest and from the Council exercising its discretion to prioritise residents for the initial three months of any new scheme being marketed. This provides residents with the opportunity to acquire an affordable home which they may purchase over the time and will be an improved offer to those applicants who have the financial means to move towards home ownership.

8) Disability

The housing needs survey carried as part of the 2014 Strategic Housing Market Assessment (SHMA) estimated there are:

- 20,293 households that contain at least one household member with a disability or limiting long term illness;
- 1.7% of households said that they have a support need;
- 10.5% of households said that their home had been adapted to meet the needs of a household member with a disability.

Residents who identify with this protected characteristic who have the financial means to access intermediate housing may benefit from specialist and supported affordable housing schemes. The GLA does promote Home Ownership for People with Long Term Disabilities (HOLD). Properties developed through these schemes enable disabled people to buy a home on a shared ownership basis, where properties available through the other Help to Buy schemes do not meet their needs.

Planning policy and housing design standards would mean any properties built would have to meet a minimum design standard for accessibility which will have a positive impact on the protected characteristic of disability.

9) Pregnancy and maternity

The only data which the Council collects for this protected characteristic is due dates for pregnancy, usually collected at the point of entry to the Common Housing Register and again at the point when a tenant signs up for a Council Tenancy. This data is used to ascertain the size of the property/the number of bedrooms a tenant requires under the 'bedroom standard'. The circumstances of the applicants and existing social housing tenants will always be considered when prioritising and allocating social housing and they will be expected to ensure that their information and circumstances are updated as and when they change.

It is thought that the introduction of this policy and the Intermediate Housing Register of Interest will not have a disproportionate impact on this protected characteristic. The new Intermediate Housing Register of interest will give residents, irrespective of any protected characteristic which they identify with, priority for the initial three months of any new scheme being marketed. This will provide residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

10) Socio-economic

During 2016-19, around two thirds of Tower Hamlets working age population were in employment- 67% that is around 7% below the employment rate in London and 8% below the employment rate in Great Britain.

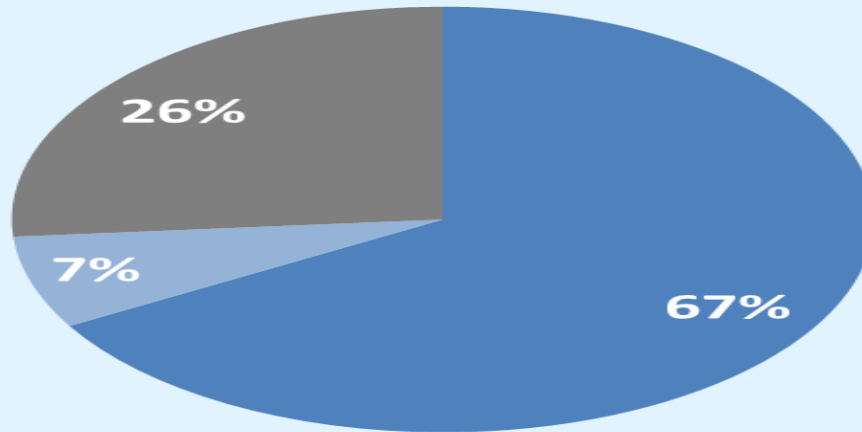
One third of the working age population were not in employment, this comprised of:

- Unemployed and actively seeking work (7%); and

- Economically inactive (26%) (this includes residents who are caring for family, or too sick to work, residents in full time education and those who would like to work)

Economic Activity, Persons Aged 16-64, Tower Hamlets, July 2016 - June 2019

■ Employed ■ Unemployed ■ Economically Inactive



Source: ONS Annual Population Survey (July to June extracts, 3 year average) 2016-2019

Intermediate Housing benefits residents with a moderate level of income, enabling social mobility for those residents who with some assistance, would be able to acquire and step into affordable housing. High rents and house prices in the Borough mean that there are many residents who are unlikely to be eligible for social housing, but who could have their housing needs met by intermediate products.

It can offer residents the opportunity to purchase a home on a shared ownership basis where they cannot afford to purchase outright. In the instance where residents are moving away from the private rented sector - where rents are typically above 40% of household's housing costs - those on lower to medium incomes may benefit from reducing their rent liabilities, in turn reducing the stress and anxiety related to affordability of housing which can impact on the mental health and well-being of residents

Many households across all tenures are affected by over-crowding, particularly as a result of their extended families moving in. Residents who have the financial means to move into an intermediate housing unit will benefit from having first priority for any new intermediate homes built within the Borough during the initial first three months of marketing. In prioritising existing social housing tenants, the policy will target sales to households who may not be able to buy a home through the right to buy, but can afford to purchase incrementally, an intermediate home; potentially releasing a much sought after social housing unit and contributing towards alleviating demand pressure on the CHR.

The new Intermediate Housing Register of interest will give residents, irrespective of any protected characteristic that they identify with, priority for the initial three months of any new scheme being marketed. This will provide residents with the opportunity to acquire an affordable home which they may purchase over time. This will be an improved offer to those applicants who have the financial means to move towards home ownership.

Target Groups	Impact – Positive or Adverse What impact will the proposal have on specific groups of service users or staff?	Reason(s)
Race	Positive	While data shows that residents who identify as BAME are often in the greatest housing need and experience considerable financial disadvantage in terms of housing affordability, the localised prioritisation of Tower Hamlets residents during the initial three months of marketing any new schemes in the Borough may encourage those who have the financial means but little chance of an offer of a social housing tenancy, an alternative form of affordable housing. Intermediate homes may also appeal to those who struggle to meet the costs of renting in the PRS. Black, Asian and minority ethnic (BAME) groups are more likely to experience poverty, are less likely to own their own home and are disproportionately affected by overcrowding. The introduction of a localised priority matrix for the initial three months of marketing new intermediate housing units in the Borough could benefit these households and help to reduce this inequality by improve access to home ownership.
Disability	Positive	Households where a member has a disability are more likely to have lower incomes. By prioritising lower income households for intermediate housing, this policy may have a positive effect on households where a household member has a disability. People with mental disabilities are likely to have problems maintaining regular full-time employment and so this would impact on the income of households where a member has mental disability. By prioritising households with lower incomes for intermediate housing this policy may have a positive effect on households where a member has a disability.
Gender	Positive	There are more women living in social housing and seeking an allocation of social housing on the Common Housing Register, than in the Borough as a whole. In prioritising local residents during the initial three-month marketing period of any new schemes, this policy may have a positive impact on women. Additionally, in Tower Hamlets women earn less than men, by prioritising lower incomes for intermediate housing, this policy may have a positive effect on households headed by women.
Gender Reassignment	Neutral	The data which the Council holds or can access on this protected characteristic is limited. It is likely that this will have a neutral impact. Where residents identify with several protected characteristics, the localised prioritisation which applies during the initial marketing of new Intermediate Schemes within the Borough will advantageous to all residents regardless of any protected characteristics which a resident may identify with.
Sexual Orientation	Neutral	The data which the Council holds or can access on the sexual orientation of residents is limited. It is likely that this will have a neutral impact. Where residents identify with several protected characteristics, the localised prioritisation which apply during the initial marketing of new Intermediate Schemes within the Borough will advantageous to all residents regardless of any protected characteristics which a resident may identify with.
Religion or Belief	Neutral	The Council recognises that there will be Muslim applicants who will be unable to access home ownership via Intermediate Housing products. An applicant cannot use a Shariah mortgage to finance the purchase of a home through shared ownership or right to buy schemes. However, Help to Buy Schemes can be used by providers of home purchase plans and there are several banks and financial institutes which offer home purchase plans which are sharia compliant. Applicants who cannot apply for a conventional mortgage will be directed towards 'Help to Buy' products (through the Greater London Authorities webpage).

Age	Positive	This policy may have a positive impact on both younger and older people by providing alternative models of home ownership and rent taking into consideration the different levels of both income and savings younger and older people are likely to have. Households may need to move to a larger home, which may be more expensive on the open market, or which are in short supply within the Borough's social housing stock. Intermediate housing may provide an option for a larger home that young families can afford, avoiding overcrowded home.
Marriage & Civil Partnerships	Positive	All residents will benefit from the introduction of an Intermediate Housing Register of interest and from the Council exercising its discretion to prioritise residents for the initial three months of any new scheme being marketed. This provides residents with the opportunity to acquire an affordable home which they may purchase over the time and will be an improved offer to those applicants who have the financial means to move towards home ownership.
Pregnancy & Maternity	Positive	Pregnancy and maternity can impact on household incomes due to potential loss of earnings. By giving higher priority to households on lower incomes, this policy statement may be beneficial to households where a household member is pregnant or households with young children. Households may need to move to a larger home, which may be more expensive on the open market, or which are in short supply within the Borough's social housing stock. Intermediate housing may provide an option for a larger home that young families can afford, avoiding overcrowded homes.
Socio-economic	Positive	Intermediate Housing benefits residents with a moderate level of income, enabling social mobility for those residents who, with some assistance, would be able to acquire and step into affordable housing. It can offer residents the opportunity to purchase a home on a shared ownership basis where they cannot afford to purchase outright. Residents who have the financial means to move into an intermediate housing unit will benefit from the ability to have priority for intermediate homes. In prioritising local residents the policy will target sales to households who may not be able to buy a home on the open market, but would be able to afford to purchase incrementally an intermediate home, potentially releasing a much sought after social housing home, in turn helping to alleviate demand pressure on the CHR.

Section 4 – Mitigating Impacts and Alternative Options

From the analysis and interpretation of evidence in section 2 and 3 - Is there any evidence or view that suggests that different equality or other protected groups (inc' staff) could be adversely and/or disproportionately impacted by the proposal?

Yes? No?

If yes, please detail below how evidence influenced and formed the proposal? For example, why parts of the proposal were added / removed? N/A

(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.)

Where you believe the proposal discriminates but not unlawfully, you must set out below your objective justification for continuing with the proposal, without mitigating action.

N/A

Section 5 – Quality Assurance and Monitoring

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

Yes? No?

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

The monitoring of these proposals and their impact on the supply of social housing in the Borough will be used to inform future revisions of the Council's policy and operational practices concerning the Intermediate Housing Register. This information will be used to inform future operational practice to mitigate any unintended disproportionate consequences arising from the proposed changes to the Council's Allocation Scheme

**Does the policy/function comply with equalities legislation?
(Please consider the [OTH objectives](#) and [Public Sector Equality Duty](#) criteria)**

Yes? No?

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

There is a deficit in the data that the Council holds on the following protected characteristics:

- Sexual Orientation
- Gender Reassignment
- Marriage and Civil Partnerships
- Pregnancy and Maternity




Section 6 - Action Plan *N/A*

*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

Appendix A

(Sample) Equality Assessment Criteria

Decision	Action	Risk
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . It is recommended that the use of the policy be suspended until further work or analysis is performed.	Suspend – Further Work Required	Red 
As a result of performing the analysis, it is evident that a risk of discrimination exists (direct, indirect, unintentional or otherwise) to one or more of the nine groups of people who share <i>Protected Characteristics</i> . However, a genuine determining reason may exist that could legitimise or justify the use of this policy.	Further (specialist) advice should be taken	Red Amber 
As a result of performing the analysis, it is evident that a risk of discrimination (as described above) exists and this risk may be removed or reduced by implementing the actions detailed within the <i>Action Planning</i> section of this document.	Proceed pending agreement of mitigating action	Amber 
As a result of performing the analysis, the policy, project or function does not appear to have any adverse effects on people who share <i>Protected Characteristics</i> and no further actions are recommended at this stage.	Proceed with implementation	Green: 