

## 2016-21 Tower Hamlets Housing Strategy Building new homes and communities

### Full Equality Assessment (EA)

#### Section 1: General Information

##### 1a) Area of Activity – Housing

LBTH Housing Strategy 2016 - 2021

##### 1b) Service area

Strategy, Sustainability and Regeneration  
Development and Renewal Directorate

##### 1c) Service Head

Mark Baigent – Service Head, Strategy, Sustainability and Regeneration (Interim)

##### 1d) Name and role of the officer/s completing the EA

Martin Ling – Housing Strategy Manager  
Aaron Cahill – Housing Strategy Project Manager  
Marc Lancaster - Private Sector Housing Policy Officer  
Tom Scholes-Fogg – Housing Policy Officer

## Section 2: Information about Housing Strategy and the EA

### 2a) In brief please explain what the assessment involves

The 2016-21 Housing Strategy sets out the strategic housing priorities for the borough over the next 4+ years. Housing is a top priority for the Mayor of Tower Hamlets. The Strategy document is designed to set out the direction of travel for the council's future approach to deliver the vision that is identified.

The lack of decent, quality, affordable housing is the major challenge the council and its residents and stakeholders currently face. Despite the borough being the top deliverer of affordable housing in the country, we need to continue to build more homes, but at a price that people can afford. We need to ensure that the homes available to us are allocated fairly and that we explore all options necessary to meet housing need. This strategy focuses also on the standard of private rented housing and how we can improve it as it is now the largest segment of the housing market. This broader vision to our approach is set out in the Tower Hamlets Partnership Community Plan 2015. The Community Plan themes focus on making the borough:

- A great place to live
- A fair and prosperous community
- A safe and cohesive community
- A healthy and supportive community.

To deliver the housing aspects of our vision in the Community Plan this housing strategy seeks to ensure that:

- there are housing choices for all sections of our diverse community
- the homes people live in are in a decent condition, warm, and weathertight
- the most vulnerable people's housing needs are met in a fair and inclusive way
- all homes are in safe, prosperous and thriving areas
- our response to housing issues is measured and achieves value for money

To deliver this vision, we have broken down our approach into four broad themes, identifying the challenges and setting out how we're going to meet them.

The themes are:

- Delivering affordable housing, economic growth, and regeneration
- Meeting people's housing needs
- Raising private rented housing standards
- Effective partnership working with residents and stakeholders.

Under each of the headings there are a number of policy actions, totalling 33 in all which are detailed in the strategy and identified to help deliver the vision.

### **Delivery Theme 1 – More affordable housing, economic growth and regeneration**

The context for this delivery theme is as follows: housing need continues to be at a very high level. As of April 2016, there were 19,124 households on the Common Housing Register seeking suitable accommodation for their needs, including homeless people; people living in overcrowded accommodation; and people with severe health and/or disability issues. In tandem with this, the borough is continuing to experience high housing growth with Tower Hamlets expected to contribute a minimum of 39,310 new homes, approximately 10 per cent of the London housing target, by 2025.

Given that there are presently 121,000 homes in the borough, this is housing growth of nearly a third of the stock presently located in the borough. Employment projections published by the GLA estimate the number of jobs in the borough will almost double, increasing by 169,000, between 2010 and 2031 to 379,000. Despite this The borough is likely to become more polarised between an increasingly wealthy home owning or renting group and a reducing group of residents in affordable housing or subsidised housing). With that is a continuing need to regenerate large areas of the borough, sometimes including estate redevelopment, which ideally should increase the amount of affordable housing; widen housing choice; and deliver wider regeneration outcomes. The challenge of this delivery theme is to calibrate economic growth and regeneration outcomes from housing-led investment to generate positive outcomes for the protected groups identified in this Equalities Impact Assessment (EA) that will help lessen the prospect of further polarisation amongst the Tower Hamlets community.

## **Delivery Theme 2 - Meeting people's housing needs**

Maintaining a high supply of new affordable housing and tackling homelessness are a core theme of this strategy, it's as important that the homes available are allocated on a fair, inclusive and transparent way. Due to the continuing high demand for affordable and other forms of suitable accommodation, the council has to think innovatively about how to meet this demand. This also means considering housing options outside the borough and also using private rented accommodation to meet its homelessness duties.

Particular attention is given to people with both physical and mental health needs and what kind of accommodation is suitable for such applicants to live independently, or with some onsite or floating support (meaning support provided through regular visits), based on what their assessed housing and health needs are. There are also other specific areas of housing needs such as those of older and younger people and gypsies and travellers which the council needs to adopt approaches to which are covered in this section.

## **Delivery Theme 3 - Raising private rented housing standards**

The context for this delivery theme is as follows:

One of the most significant housing changes in the past decade has been the growth of the private rented sector and the decline of both owner occupation and social renting. In Tower Hamlets, between 2001 and 2011 owner occupation declined in terms of relative tenure share by 2.4 percentage points and social rent by 12.9 percentage points. Private renting increased by 15.3 percentage points, by April 2014 accounting for around 39% of the housing stock compared to 31% across the whole of Inner London and 18% across the UK. Owner occupation is particularly low in Tower Hamlets, at just 27% - including only 7% who own outright - compared to 64% in the UK, half of whom own outright.

More than a third (37%) of the borough's privately-rented housing was built after 1990. In general, this new-build housing is relatively expensive, well-managed and let in single or shared occupancy. A proportion is let on a short-term basis including to financial-sector employees in Canary Wharf.

However, many private sector homes in the borough are in poor condition and poorly managed. A fifth of privately rented homes do not meet decent homes standards, and around 29% of vulnerable households in the private sector live in non-decent housing.

A significant number of former council homes bought under the right to buy are now let to private tenants. Tower Hamlet Homes estimate that around 50% of properties sold under Right to Buy are now privately rented. In some instances this has led to serious overcrowding and anti-social behaviour such as noise nuisance, fly-tipping, and drug-related criminal behaviour on estates owned by the council and its housing associations partners.

Most private landlords have small portfolios: around 89% of landlords are private individuals, accounting for 71% of all PRS dwellings, with 78% of all landlords owning a single dwelling for rent – 40% of the total stock. Only 5% of landlords were companies, accounting for 15% of PRS stock.

A minority of private landlords and agents deliberately profit from leaving their tenants to live in rundown, unsafe, or overcrowded properties, or intimidate and threaten tenants.

Median rents have increased by around a quarter in the last five years making the private rented sector unaffordable for many Tower Hamlets residents. This is particularly acute in workless households dependent on increasingly inadequate levels of housing benefit. In spite of this, the sector provides a significant amount of accommodation used by the council to meet housing need.

#### **Delivery Theme 4 - Effective partnership working with residents and stakeholders**

The context for this delivery theme is to facilitate greater partnership working between the council's residents and the broader stakeholder environment. Ultimately, the success of the housing strategy and the actions identified are largely dependent on successful partnership working with residents, housing associations, the Greater London Authority and private sector partners. This section seeks to unpack who the key relationships need to be with and what outcomes should be sought. In the context of this EA, a key challenge is to ensure that protected groups are engaged with and meaningful efforts are made to access difficult to reach groups.

## Community Profile

The following statistics illustrate the diversity of the population of Tower Hamlets and these statistics have helped inform the conclusions reached in this assessment. An in depth evidence base has also been produced to support the development of the Housing Strategy.

- The population of Tower Hamlets was estimated to be 295,200 as at June 2015.
- This represents an increase of around eleven thousand people over the year - a percentage increase of 3.9 per cent – the second largest percentage rise in England & Wales, after the City of London (+8.5 per cent).
- Over the decade to 2015, the Tower Hamlets population has increased by 38.3 per cent – the largest increase in of all local authority areas in England and Wales.
- Of the borough's population increase over the last year (+11,200): around a third was due to natural change, which is the difference between births and deaths. The remaining 69 per cent was due to a positive net migration flow, driven by international migration.
- Tower Hamlets has relatively high levels of population mobility or 'turnover'. Population turnover rates capture the size of the population flows in and out of the borough each year, relative the size of its population. In 2014/15 the turnover rate was 224 per 1000 population – the 11th highest rate in England and Wales, and 9<sup>th</sup> highest in London.
- Tower Hamlets has a relatively young age structure, characterised by a high proportion of young adults. Almost half of all borough residents (48 per cent) are aged 20-39, significantly higher than the percentage nationally (26 per cent in England) or regionally (35 per cent), and the highest percentage of all local authority areas in England and Wales.
- Conversely, Tower Hamlets has proportionately fewer older residents compared with other areas: 9 per cent of Tower Hamlets residents are aged 60 or over, compared with 23 per cent in England & Wales and 16 per cent in London. Tower Hamlets has the lowest proportion of over 60s in England & Wales.

- The proportion of children aged under 16 in the borough population is 20 per cent - similar to that of London and nationally (20 and 19 per cent respectively).
- More than two thirds (69 per cent) of the borough's population belong to minority ethnic groups (ie not White British): 55 percent belong to BME (Black and Minority Ethnic) groups and a further 14 per cent are from White minority groups.
- The Census provides data about 18 different ethnic group populations. The borough's three largest groups are the Bangladeshi, White British and 'Other White' populations. Considered together, people from these three ethnic groups make up around three-quarters of the Tower Hamlets population.
- The Bangladeshi population makes up almost one third (32 per cent) of the borough's population – considerably larger than the proportion across London (3 percent) or England (under 1 per cent). Tower Hamlets has the largest Bangladeshi population in England.
- White British residents comprise 31 percent of the borough's population, far lower than the percentage nationally (80 per cent). Tower Hamlets has the fifth lowest proportion of White British residents in England. Newham and Brent had the lowest rates (17 and 18 per cent respectively).
- The third largest ethnic group in the borough is the 'Other White' group who comprise one in eight borough residents – close to the London average. This group is very diverse and includes residents from a mix of ethnic backgrounds (eg Europeans, Australians, Americans).
- Residents from Black ethnic groups make up 7 per cent of the population comprising: 4 per cent from Black African groups; 2 percent from Black Caribbean groups; and 1 percent from Other Black groups. Tower Hamlets has a smaller proportion of Black residents compared to the London average (7 vs. 13 per cent).

- **Disability and caring**

- The Census 2011 results showed that 13.5% of residents stated that they had a long-term health problem or disability that limited their day to day activities (34,300 residents) This is slightly lower than the regional and national rates (14.1% in London and 17.6% England)
- The 2011 Census found that 19,356 residents provided some level of unpaid care in the borough, which accounted for 7.6% of all LBTH residents. Compared with London and England averages, the provision of unpaid care in the borough is significantly skewed towards the provision of more (20+) hours. While 56.5% of those providing unpaid care do so for 19 hours per week or less, the remaining 43.5% provided 20 hours per week or more. 18.1% of carers provide 20 to 49 hours of care per week, and over a quarter provide unpaid care for 50 hours or more per week (4,915 residents).

**2b) What are the equality implications of your proposal?**

The intention is that the equality implications of the proposals set out in this document are overwhelmingly positive. It should be noted the 2016-21 Housing Strategy is in essence a 'direction of travel' document.

On adoption of the Housing Strategy the actions will provide the rationale for individual decisions. The majority of the actions will require further specific actions/permissions from the Mayor of Tower Hamlets supported by Cabinet members as they will require commitment of expenditure or direction on how existing expenditure is directed. This is particularly relevant in the context of the medium term financial strategy for the council, resources available to deliver the actions identified in this document can be expected to reduce, both from revenue and capital sources.

In addition with the continuing roll out of welfare reform, it can be expected that there will be negative impacts on the protected groups which the council is not necessarily in a position to fully mitigate.



## **Recommendation**

### **2c) What is the cumulative equality impact of your proposal?**

The cumulative equality impacts of the 2016-21 Housing Strategy are considered to be positive. As identified in the four themes above, the council is seeking to meet a broad range of housing needs, particularly from people from disadvantaged backgrounds who historically are over-represented amongst the protected groups identified by the council. The council will need to be mindful in certain instances to ensure that positive impacts for certain protected groups do not unintentionally negatively impact on other protected groups. The council will also be seeking to mitigate the negative impacts of welfare reform on protected groups as the imposition of the Local Housing Allowance on supported housing and the £23,000 Universal Credit cap on households where there is no adult in employment means that such households are unlikely to be able to afford to live in the borough, particularly if they live in private rented accommodation.

Further assessments of individual policies which emerge from the Housing Strategy will be carried out and if any potential negative impacts are identified mitigating actions will be identified accordingly.

In Section 3 of this document the broad equality impacts on each of the protected groups each of the first three delivery themes are addressed in turn. For the final delivery theme – effective partnership working with residents and stakeholders – the council's approach will be to continue to work with residents and stakeholder groups who either represent or are from the protected groups to ensure their needs and aspirations are not negatively impacted by any of the council's housing proposals.

## Section 3: Equality Impact Assessment

### Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration

#### 1. Disability

#### Identify the effect of the housing strategy on different disability groups

*Please describe the analysis and interpretation of evidence to support your conclusion.*

Maintaining a sustained supply of affordable housing that meets disabled people's needs will deliver positive outcomes for disabled people. Current policy is that 10% of affordable housing should be accessible (or capable of adaptation) for people who use wheelchairs. The council is committed to delivering between 35% and 50% of new housing as affordable housing as set out in its current planning policy and therefore meeting this target will help deliver positive outcomes for this protected group.

The Strategy confirms the Council's commitment to Project 120, which was started in 2012 to address the specific housing needs of families with a wheelchair user and other complex medical needs on the Council's Housing waiting list. The name stems from the 120 families who were on the Accessible Housing waiting list at that time.

The Council works closely with developers and housing associations to identify specific needs of a family at an early stage and identify a property in development which can then be adapted accordingly to meet that need. The project has been very successful and by April 2016, 148 families had been rehoused accordingly.

The Strategy has a commitment to work towards meeting the housing needs of people with mental illness including learning disabilities and autism and where appropriate opportunities for new build development tailored to meet this need will be considered within an overall accommodation plan for this group

### Delivery Theme 2 - Meeting people's housing needs

The proposed changes will have a positive impact on disabled people in Tower Hamlets. The Council will continue to work with landlords and developers to assist with ensuring the needs of disabled residents are met through new build programmes and Disabled Facilities Grant for home modifications which private residents, registered providers and landlords may apply for.

The Census 2011 results showed that 13.5% of residents stated that they had a long-term health problem or disability that limited their day to day activities (34,300 residents) Data has also been collected about the extent to which the home had been built or adapted to meet the needs disabled persons and what facilities need to be provide. 10.5% of households said that their home had been adapted to meet the needs of a disabled household member.

The vulnerable adults commissioning team are developing an Accommodation Plan which will provide an overview of the accommodation available to people with learning disabilities (LD). The borough seeks to improve the overall offer of accommodation including opportunities to invest to save whilst also supporting young people to remain close to their families, friendship networks and local community. We expect the number of people with disabilities and long term conditions, for example, dementia, autism, to grow and people are likely to live for longer with these health conditions. The Children and Disabilities Joint Strategic Needs Assessment (JSNA) for the borough states that the number of children with special educational needs (SEN) and disabilities is higher than both London and England averages. It is therefore likely that the demand for accessible housing will increase and the design of new local housing needs to reflect that. Taken with the longer term broad objective of relocating people with learning disabilities currently located outside the borough back into Tower Hamlets, this will increase demand for suitable accommodation, often on the ground floor.

### **Delivery Theme 3 - Raising private rented housing standards**

Private renters in the borough tend to be in better health than residents in other tenures. In 2011, 6% of Tower Hamlets residents identified themselves as being in bad or very bad health. Only 1.9% of private renters class themselves as being in poor health. 4.1% of owner occupiers including those living in shared ownership class themselves as being in poor health. Residents with bad or very bad health disproportionately live in social rented housing – in 2011, 10.1% of social renters identified themselves as having bad or very bad health. On the other hand, 35% of households living in private rented accommodation have a disabled resident.

The Housing Strategy aims to refresh the private sector housing renewal policy, improving partnership working and coordination with the Better Care Fund. The refresh aims to provide more customer focused services, to reduce hospital admissions and to enable people to return from hospital more quickly. The refresh also aims to broaden access to the Disabled Facilities Grant, improving the quality of life for people living with limiting disabilities by providing aids and adaptations at home.

The Private Sector Housing Strategy refocuses resources and powers, including around licensing, on the environmental health team. This focus aims to improve conditions in the privately rented housing in the borough, in particular dealing with conditions that cause ill health. Improving physical standards and the quality of management in the PRS will deliver social and health benefits. The links between poor health through damp and mould and overcrowding are well established. The strategy will have a positive impact on disabled households.

The adoption of the 2016-21 Housing Strategy is expected to have a positive impact on this protected group.

<p><b>2. Gender reassign - ment</b></p> <p><i>Identify the effect of the restructure on different gender groups (inc Trans) groups</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p><b>Will the change in your policy/service have on people who have had their gender reassigned or are undergoing gender reassignment?</b></p> <p>There is no evidence to suggest or reason to believe that people with reassigned gender will be disproportionately affected by the Housing Strategy. Rather, the aim of improving housing conditions in the borough will be of benefit to this group to the same extent as others.</p> <p><b>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</b></p> <p><b>Theme 1, Delivering affordable housing, economic growth, and regeneration is</b> not expected to have either a negative or positive impact on people who have transitioned or are transgender.</p> <p><b>Delivery Theme 2 - Meeting people’s housing needs</b></p> <p><b>Theme 2 - Meeting people’s housing needs</b> is not expected to have either a negative or positive impact on people who have transitioned or are transgender</p> <p><b>Delivery Theme 3 - Raising private rented housing standards</b></p> <p><b>Theme 3 - Raising private rented housing standards</b> is not expected to have either a negative or positive impact on people who have transitioned or are transgender</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a <b>neutral</b> impact on this protected group.</p>
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<p><b>3. Pregnancy and maternity</b></p> <p><i>Identify the effect of the housing strategy on women who are pregnant or in maternity</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p><b>Will the change in your policy/service have an adverse impact on women who are pregnant or in maternity?</b></p> <p>There is no evidence to suggest or reason to believe that women who are pregnant or in maternity will be disproportionately affected by the Housing Strategy. Rather, the aim of improving housing conditions in the borough will be of benefit to this group to the same extent as others.</p> <p><b>Delivery Theme 1, Delivering affordable housing, economic growth, and regeneration</b></p> <p>Theme 1, Delivering affordable housing, economic growth, and regeneration is not expected to have either a negative or positive impact on women who are pregnant or in maternity</p> <p><b>Delivery Theme 2 - Meeting people's housing needs</b></p> <p>Theme 2 - Meeting people's housing needs is not expected to have either a negative or positive impact on women who are pregnant or in maternity</p> <p><b>Delivery Theme 3 - Raising private rented housing standards</b></p> <p>Theme 3 - Raising private rented housing standards is not expected to have either a negative or positive impact on women who are pregnant or in maternity</p> <p>The Council have consulted widely in developing the strategy including with members of the Tower Hamlets Parent and Carer Council.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a <b>neutral</b> impact on this protected group.</p>
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<p><b>4. Race</b></p> <p><i>Identify the effect of the housing strategy on different race groups including ethnic or national origins, colour and nationality</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p><b>Will the change in your policy/service have an adverse impact on race groups including ethnic or national origins, colour and nationality?</b></p> <p>The council has actively involved ethnic minority communities in consulting on the 2016-2021 housing strategy. Such consultation has involved holding events at idea stores, consulting people in markets across the borough and attending Friday prayers.</p> <p><b>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</b></p> <p>Ethnic minority households in the borough are disproportionately in more housing need in the borough with nearly 70% of applicants on the common housing register being from black and minority ethnic communities. Bangladeshi families represent nearly 55% of those on the list compared to a borough population of 33%. A high proportion of these households are overcrowded and require larger family homes.</p> <p>The Housing Strategy reflects the current local plan target of 45% of new affordable homes being family size in order to meet this need from this community.</p> <p><b>Delivery Theme 2 - Meeting people's housing needs</b></p> <p>Ethnic minority households in the borough are disproportionately affected by homelessness, as is the case regionally. In 2015/16 80% of households accepted as homeless were from BME groups. However, ethnic minority groups account for nearly 70% of the borough's population.</p>
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**4. Race  
 (cont/...)**

*Identify the effect of the housing strategy on different race groups including ethnic or national origins, colour and nationality*

*Please describe the analysis and interpretation of evidence to support your conclusion.*

Bangladeshi households are, by far, more likely to be homeless than any other ethnic group in the Borough. Though only accounting for 30% of the population, 59% of households accepted as homeless in 2015/16 are Asian. Black households in the borough are also disproportionately affected by homelessness when compared to the population as a whole. Black households make up 16% of households accepted as homeless, but represent 7% of the Borough's population.

The Tower Hamlets Strategic Housing Market and Needs Assessment (SHMA) found that BME households are, on average, larger and more likely to be overcrowded. The Housing allocations scheme gives a high priority for overcrowded families and the changes to the policy set out in the new strategy do not change this priority banding.

In addition the Council has an agreed overcrowding reduction plan which sets out a number of actions and initiatives to reduce overcrowding including encouraging under-occupiers to properties more suitable to their needs.

On the needs of Gypsies and travellers, council officers will liaise in order to ensure gypsy and traveller needs are fully considered in the housing strategy and set out in the local plan to be adopted in late 2017.

**Delivery Theme 3 - Raising private rented housing standards**

The Council's Private Housing Strategy aims to benefit all private tenants. Inevitably, this will disproportionately benefit those groups over-represented in the private sector - white people from non-British backgrounds and people of Chinese heritage. However, there is no evidence or reason to believe that this will disadvantage other groups. Specific actions proposed by the strategy will benefit minority groups.

White people from non-British backgrounds are significantly over-represented in the PRS: these groups represent 30.2% of private renters in the borough but just 14.5% of the total population. Nearly two thirds of white people from non-British backgrounds in Tower Hamlets - 64.8% - live in the private rented sector.

People of Chinese heritage are also significantly over-represented, forming less than 2% of the population but 5% of private renters. Nearly half of people with Chinese ethnicity in Tower Hamlets – 49.6% - live in the private rented sector.

Other ethnic groups are under-represented. White British people make up 35.5% of private renters in the borough but 40.8% of the population. Overall, BAME communities represent 34.25% of private renters in the borough but 42.4% of the total population. 34.3% of Tower Hamlet's BAME population and 20.4% the borough's white British

<p><b>4. Race (cont/...)</b></p> <p><i>Identify the effect of the housing strategy on different race groups including ethnic or national origins, colour and nationality</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Owner occupiers are disproportionately white: 68.5% of owner-occupies are white. Most of these are British: just 12.4% of home owners are from non-British white backgrounds. whilst those groups make up 14.5% of the population.</p> <p>Conversely, whilst the BME communities make up over 70% of the population, they represent just 31.6% of owner-occupiers. 11.6% owner-occupiers are of Bangladeshi heritage. Around 70% of households with a Black household reference person are social renters.</p> <p>Some actions aim to benefit specific excluded groups. The Council's engagement with agents and landlords will include a focus on mitigating the impact of the Immigration Act 2015's "right to rent" requirements in order to try to prevent discrimination against BAME and new migrant groups. A number of actions - notably licensing - aim to engage directly with landlords to improve standards. This is likely to be of particular benefits to tenants who do not have English as a first language and are therefore less likely to report their landlords for breach of standards: a quarter of households in Whitechapel and Spitalfields and Banglatown, where the licensing scheme is focused, do not have English as a first language. The Council have consulted widely in developing the strategy including with Praxis service users.</p> <p>Overall, the adoption of the 2016-21 Housing Strategy is expected to have a <b>positive</b> impact on this protected group.</p>
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**5. Religion or belief**

*Identify the effect of the housing strategy on people who have religious views or beliefs using the prompts above*

*Please describe the analysis and interpretation of evidence to support your conclusion.*

**Will the change in your policy/service have on people who have religious views or beliefs?**

Tower Hamlets has the highest percentage of Muslim residents in England and Wales – 38 per cent compared with a national average of 5 per cent. Conversely, the borough has the lowest proportion of Christian residents nationally: 30 per cent compared with a national average of 59 per cent. The council is aware of the high percentage of Muslim residents particularly of Bangladeshi heritage in the borough and is aware they suffer from particular aspects of housing need such as acute over-crowding. Section 4 on race sets out the issues covered within the housing strategy which relate to this group

**Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration**

Theme 1 - Delivering affordable housing, economic growth, and regeneration **will** generally have a neutral effect on people who have religious views or beliefs. It should be noted that there can be positive impacts in certain instances if new places of faith are built as part of wider regeneration projects.

**Delivery Theme 2 - Meeting people’s housing needs**

Theme 2 - Meeting people’s housing needs will generally have a neutral effect on people who have religious views or beliefs

**Delivery Theme 3 - Raising private rented housing standards**

With the exception of Muslims and people of no religion, the representation of different faith and belief groups in the private rented sector reflects Tower Hamlets’ broader demographic very closely. 34.9% of the borough’s population but just 17.1% of private renters identify themselves as Muslim; and 19.0% of the population but 30.3% of private renters say they have no religion.

There are no reasons to believe that any aspect of the housing strategy negatively affects any religious or belief group. There are reasons to believe that the strategy of engagement with agents and mitigation of the impact of the Immigration Act 2015’s “right to rent” requirements will have a positive impact on Muslim residents.

<p><b>5. Religion or belief (cont/...)</b></p> <p><i>Identify the effect of the housing strategy on people who have religious views or beliefs using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Immigration Act 2015's "right to rent" requirements will have a positive impact on Muslim residents.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a <b>neutral</b> impact on this protected group.</p>
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<p><b>6. Sex</b></p> <p><i>Identify the effect of the housing strategy on women using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p><b>Will the change in your policy/service have an adverse impact on women?</b></p> <p>Most areas of the housing strategy will have a neutral impact on women as most areas of the strategy are gender neutral. However a high proportion of single parents in housing need will be women and women are more likely to be affected by domestic violence.</p> <p><b>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</b></p> <p>Theme 1 - Delivering affordable housing, economic growth, and regeneration will generally have a neutral effect on women</p> <p><b>Delivery Theme 2 - Meeting people’s housing needs</b></p> <p>Theme 2 - Meeting people’s housing needs will generally have a neutral effect on women</p> <p><b>Delivery Theme 3 - Raising private rented housing standards</b></p> <p>Theme 3 - Raising private rented housing standards will generally have a neutral effect on women</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a <b>neutral</b> impact on this protected group.</p>
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## 7. Sexual Orientation

*Identify the effect of the housing strategy in relation to people who are lesbian, gay or bisexual using the prompts above*

*Please describe the analysis and interpretation of evidence to support your conclusion.*

### **Will the change in your policy/service have an adverse impact on lesbian, gay or bisexual people?**

It is widely recognised that issues related to sexuality and sexual identity can play a key role in the onset of homelessness (Crisis, 2005). Research by the Albert Kennedy Trust in 2015 shows that LGBT young people are more likely to find themselves homeless than their non LGBT peers, comprising up to 24% of the youth homeless population. Further, 69% of LGBT homeless youth have experienced familial rejection, abuse and violence; and homeless LGBT youth were also much more likely than their heterosexual counterparts to participate in substance abuse and fall prey to sexual exploitation on the streets. Only 2.6% of the housing services surveyed by Albert Kennedy Trust acknowledged the unique needs of homeless LGBT young people and had services to meet these needs.

Hard data on older LGBT people is less easily available: indeed it is of concern that 30% of agencies still fail to monitor sexual orientation or gender identity. Homeless Link estimated in 2010 that 7 per cent of clients using homelessness services were LGBT.

2010 data collected by Stonewall shows that from 760 callers to their helpline 73 were sleeping rough, 44 were in hostels, refuges or night shelters and 104 sofa surfing. For under 25s the number of people who were street homeless, or sofa surfing increased.

Work by the charity Polari highlights the difficulties faced by older GLBT individuals, particularly as they find themselves forced to adapt to new housing arrangements including living in sheltered accommodation and long term residential or nursing facilities

Whilst there is no reason to believe that residents of any sexuality will be disadvantaged by the proposals set out in the housing strategy, the Council and its partners will need to be mindful of the needs of this group particularly in relation to the provision of services to single homeless people

**7. Sexual Orientation**

**Identify the effect of the housing strategy in relation to people who are lesbian, gay or bisexual using the prompts above**

**Please describe the analysis and interpretation of evidence to support your conclusion.**

**Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration**

Theme 1 - Delivering affordable housing, economic growth, and regeneration will have a neutral impact on lesbian, gay or bisexual people

**Delivery Theme 2 - Meeting people's housing needs**

Theme 2 - Meeting people's housing needs will have a neutral impact on lesbian, gay or bisexual people

**Delivery Theme 3 - Raising private rented housing standards**

Theme 3 - Raising private rented housing standards will have a neutral impact on lesbian, gay or bisexual people

<p><b>8. Marriage and Civil Partnerships</b></p> <p><i>Identify the effect of the housing strategy in relation to people who are married or in civil partnership using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p><b>Will the change in your policy/service have an adverse impact on people who are married or in civil partnerships?</b></p> <p>The 2011 census states that 22.4% of the borough's households contain married or civil partners, 9.5% cohabiting couples. In the private rented sector, couples are disproportionately unmarried: 15.3% are married or civil partners whereas 13.5% are not. Owner occupiers are disproportionately married or civil partners: 26.2% rather than 11.6%.</p> <p>People who are married or in civil partnerships are treated in the same way as single people in term of housing need and there is no evidence to suggest that any aspect of the housing strategy will have an adverse impact on this group</p> <p><b>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</b></p> <p>Theme 1 - Delivering affordable housing, economic growth, and regeneration will have a neutral impact on people who are married or in civil partnerships?</p> <p><b>Delivery Theme 2 - Meeting people's housing needs</b></p> <p>Theme 2 - Meeting people's housing needs will have a neutral impact on people who are married or in civil partnerships?</p> <p><b>Delivery Theme 3 - Raising private rented housing standards</b></p> <p>Theme 3 - Raising private rented housing standards people needs will have a neutral impact on people who are married or in civil partnerships?</p> <p>There is no reason to believe that either married couples, civil partners or cohabiting couples will be disadvantaged by the private sector housing strategy.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a <b>neutral</b> impact on this protected group.</p>
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<p><b>9. Age</b></p> <p><i>Identify the effect of the housing strategy in relation to people who are from certain age groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p><b>Will the change in your policy/service have an adverse impact on people from certain age groups?</b></p> <p><b>Please describe the analysis and interpretation of evidence to support your conclusion.</b></p> <p><b>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</b></p> <p>The Council aims to deliver a range of affordable housing to meet the needs of the whole community including families with young children, older persons and younger adults who have yet to form long term households but wish to live in the borough. The Local Plan sets out affordable housing requirements across a range of bedroom sizes in order to provide a balanced approach to meeting a range of needs form people at different stages in their life.</p> <p><b>Delivery Theme 2 - Meeting people’s housing needs</b></p> <p>The council recognises that people are living longer and often do not have housing choices that enable them to more to more appropriate sized accommodation that meets their needs. The Cabinet adopted an older persons’ housing needs statement in April 2013, and has been proactive in ensuring the needs of older residents are met.</p> <p>The 2011 Census revealed that Tower Hamlets was the home to 24,300 people over the age of 60. The council recognises that the housing needs of older people are different in that one 65-year-old may be fit and healthy, and be able to live an independent life, whilst another 65-year-old may be unwell and restricted, thus have to live in sheltered accommodation.</p> <p>It is estimated that the number of people over 65 in the Borough will increase by approximately 26% between 2016 and 2026. In 2016 8.2% of the borough’s population consisted of those over 60, this will increase to 8.4% in 2021, 9.1% in 2026, 10.2% in 2031, and 11.3% in 2036. The 2011 Census revealed that 65% of older people in the Borough have a long-term illness. The Council is developing an Ageing Well strategy that will be designed to include a holistic approach to meeting the changing housing needs of elderly people.</p> <p>Conversely younger people are more likely to be impacted by homelessness and the Strategy sets out a range of response to meet the needs of this group through housing advice, hostel provision and advocacy.</p>
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**9. Age**

**Identify the effect of the housing strategy in relation to people who are from certain age groups using the prompts above**

**Please describe the analysis and interpretation of evidence to support your conclusion.**

of measure to help meet the needs of this group.

Will the change in your policy/service have an adverse impact on people from certain age groups?

Conversely younger people are more likely to be impacted by homelessness and the Strategy sets out a range of response to meet the needs of this group through housing advice, hostel provision and advocacy.

**Delivery Theme 3 - Raising private rented housing standards**

Tower Hamlets is a relatively young borough – 39% of the population were aged between 20 and 34 in 2011. The younger the resident, the more likely they are to live in the private rented sector. In 2014, three in five young adult households were private renters, the largest share of any age group. Since the Council’s Private Housing Strategy aims to benefit all private tenants, younger people will disproportionately benefit. However, there is no reason to believe that older age groups will be disadvantaged. Indeed, changes proposed in the strategy to partnership working around Disabled Facilities Grant and the Better Care Fund are likely to directly and disproportionately benefit older people.

Two thirds of Tower Hamlets adults aged 24 and under (65.6%) live in the private rented sector. That proportion falls for each successive age group, until just 6.8% of the over 65s rent privately. 68.3% of private renters in Tower Hamlets are aged under 35; just 2.2% of private renters are aged 65 and over.

Age group	% of group live in PRS	% of PRS are in this group
24 and under	65.6	15.1
25-34	54	53.2
35-49	25.9	24.4
50-64	10.6	5.1
65 and over	6.8	2.2



<p><b>Age (cont/...)</b></p> <p><i>Identify the effect of the housing strategy in relation to people who are from certain age groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>Rates of home ownership are lowest in the youngest and oldest age groups: 10.1% of residents aged under 25, and 27.4% aged 65 and over, are owner-occupiers. Just 3% of owner occupiers in the borough are aged under 25.</p> <p>The strategy entails refreshing the Council's private sector housing renewal policy to set out the approach, including to partnership working and the Better Care Fund, over the 2016-21 years. The strategy aims to provide more customer focused services, to reduce hospital admissions and to enable people to return from hospital more quickly. In 2015-2016, 133 residents aged over 65 received Disabled Facilities Grant, 57.1% of the total number of grants given. Whilst it should be noted that this is a lower proportion than nationally - 71% of grants go to people over the age of 60 – this will clearly have a disproportionately positive impact on older people.</p> <p>Older people going into care often have to sell their homes to pay fees. The Private Sector Housing Strategy proposes developing packages to enable these people to let their homes through the Council rather than selling them.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a <b>neutral</b> impact on this protected group.</p>
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<p><b>10. Socio economic</b></p> <p><i>Identify the effect of the housing strategy in relation to people who are from low income, low wealth groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p><b>Will the change in your policy/service have an adverse impact on people who are on low incomes and have low wealth?</b></p> <p><b>Please describe the analysis and interpretation of evidence to support your conclusion.</b></p> <p><b>Delivery Theme 1 - Delivering affordable housing, economic growth, and regeneration</b></p> <p>The obvious contribution that affordable housing can make to improving socio-economic inclusion is ensuring that affordable housing costs are sufficiently low enough to allow occupiers of affordable housing for rent and ownership to have sufficient disposable income to make work pay and/or ensure people have income left over to meet other subsistence costs. Key to that is aligning economic growth and regeneration outcomes deliver employment opportunities for local people living in disadvantaged areas of the borough.</p> <p><b>Delivery Theme 2 - Meeting people's housing needs</b></p> <p>The demographics of Tower Hamlets are very mixed. This is a diverse borough and one in which there is a high level of poverty. According to council data 44% of households are in income poverty and struggle to pay for basic bills such as gas, electricity and water.</p> <p>The changes to the allocations scheme require the council to set aside 1% of lets to rehouse social housing tenants who want to move for employment reasons. These changes came into effect in April 2015. The Lettings Plan will be amended to add social workers as key workers in order to improve recruitment and retention in the borough.</p> <p>For those working people in the borough who don't qualify for social housing or are struggling to afford to rent in the private rented sector, it is proposed in the housing strategy that an intermediate housing register is developed. This would mean rents are above social rents but no less than 20% less than market rents. LBTH data shows there are an estimated 2,800 intermediate housing units in the Borough.</p> <p>LB Tower Hamlets must comply with this law; however as of September 2016 the Government has not yet published regulations stating how this law will be implemented. The legislation will result in households earning more than £40,000 in London to pay more rent if they want to remain living in social housing. This rent increase is estimated to be an extra 15 pence for every £1 earned in salary.</p>
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<p><b>10. Socio economic (cont/...)</b></p> <p><i>Identify the effect of the housing strategy in relation to people who are from low income, low wealth groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p><b>Delivery Theme 3 - Raising private rented housing standards</b></p> <p>Housing is a key factor shaping poverty in London, with high poverty rates associated with high housing costs, and a notable shift towards poverty in the private rented sector. Housing costs make a significant difference in all wards across Tower Hamlets, with child poverty <i>after</i> housing costs around 13 to 16 percentage points higher than before housing costs.</p> <p>Poverty is concentrated among renters in London, with just under a half of social renting households and two in five private renting households in poverty in 2013/14, compared to around one in six owner occupiers.</p> <p>Tower Hamlets is highly deprived on the barriers to housing and services domain. In terms of the average LSOA score measure, Tower Hamlets is ranked 4th most deprived out of 326 areas in England on this domain, after Newham, Waltham Forest and Brent. Almost two thirds (62 per cent) of the borough's LSOAs fall within the ten per cent most deprived in England on this domain – the second highest proportion nationally, after Newham (where 84 per cent of LSOAs are highly deprived).</p> <p>The private rented sector consists of different markets catering to different socio-economic groups. Residents on medium and low incomes are entirely excluded from accommodation with higher levels of rent.</p> <p>However, median rents have increased by around a quarter in the last five years making the private rented sector unaffordable for many Tower Hamlets residents. This is particularly acute in workless households dependent on increasingly inadequate levels of housing benefit.</p> <p>Only about 10% of housing benefit claimants live in the private rented sector. Of these, in 2015 more than half were in work. Private tenants are less likely in general to be in poverty in Inner than Outer London, both because it is too expensive for most people in poverty to continue to rent privately, and because the larger social housing stock means more of the poor are housed in social housing.</p>
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<p><b>10. Socio economic (cont/...)</b></p> <p><i>Identify the effect of the housing strategy in relation to people who are from low income, low wealth groups using the prompts above</i></p> <p><i>Please describe the analysis and interpretation of evidence to support your conclusion.</i></p>	<p>The housing strategy aims to make private rented housing more accessible to lower income groups by maximising the number of landlords willing to let to homeless households and low-income households nominated by the Council. Its impact here is positive for poorer residents.</p> <p>Whilst the English Housing Survey suggests that, nationally, satisfaction with accommodation is broadly similar for private renters of different income groups, the lowest quality accommodation objectively is let to tenants who have the lowest income.</p> <p>The strategy aims to develop the borough's licensing schemes, and to give greater focus and resource to enforcement activity, in order to improve housing conditions in the sector. Around 29% of vulnerable households living in private sector live in non-decent housing. Much of the strategy aims at improving conditions in the cheapest housing – including houses in multiple occupation - and therefore it is these financially and socially excluded households that will benefit most.</p> <p>It is arguable that in such a buoyant private rented market working with landlords to improve conditions will drive up rents even further, disadvantaging and ultimately driving out poorer residents. There is no evidence to confirm this. The strategy aims to bring housing up to a minimum acceptable standard in order to realise the Council's commitment to ensuring that the homes people live in are in a decent condition, warm, and weathertight.</p> <p>The adoption of the 2016-21 Housing Strategy is expected to have a <b>positive</b> impact on this protected group.</p>
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**Section 4: Equality Impact Assessment Action Plan**

**Please list in the table below any adverse impact identified and, where appropriate, steps that could be taken to mitigate this impact.**

If you consider it likely that your proposal will have an adverse impact on a particular group (s) and you cannot identify steps which would mitigate or reduce this impact, you will need to demonstrate that you have considered **at least one alternative** way of delivering the change which has less of an adverse impact.

Adverse impact	Please describe the actions that will be taken to mitigate this impact
None	

**If an adverse impact cannot be mitigated please describe an alternative option, its costs and the equality impact.**

Alternative option	

## Section 5: Future Review and Monitoring

**Please explain how and when the actual equality impacts of the Housing Strategy will be reviewed and monitored.**

The implementation of the 33 policy actions set out in the Housing Strategy will be monitored and reviewed quarterly / three times a year. As part of that process, the equality impacts of the policy actions will be monitored, particularly when more detailed proposals are put forward (and individual EAs developed) and implemented.

## APPENDIX A: Equality Impact Assessment Test of Relevance

TRIGGER QUESTIONS	YES / NO	IF YES PLEASE BRIEFLY EXPLAIN.....
Does the Strategy reduce resources available to address inequality?	No	
<b>CHANGES TO A SERVICE</b>		
Does the Strategy alter access to the service?	No	The Strategy covers a range of services, many of which will be reshaped over the lifetime of the strategy in order to achieve the efficiencies that the Council has to achieve by 2020.  Changes to specific service areas and the impact on access will be considered in more detail through individual restructure or policy plan changes.
Does the Strategy involve revenue raising?	No	The Strategy does not propose any specific revenue raising proposals

Does the Strategy alter who is eligible for the service?	No	The Strategy does not propose any changes to eligibility for services
Does the change involve a reduction or removal of income transfers to service users?	No	
Does the change involve a contracting out of a service currently provided in house?	NO	
<b>CHANGES TO STAFFING</b>		
Does the change involve a reduction in staff?	No	<p>The Strategy covers a range of services, many of which will be reshaped over the lifetime of the strategy in order to achieve the efficiencies that the Council has to achieve by 2020.</p> <p>Changes to specific service areas and the impact on access will be considered in more detail through individual restructure or policy plan changes</p>
Does the change involve a redesign of the roles of staff?	NO	<p>The Strategy covers a range of services, many of which will be reshaped over the lifetime of the strategy in order to achieve the efficiencies that the Council has to achieve by 2020.</p> <p>Changes to specific service areas and the impact on access will be considered in more detail through individual restructure or policy plan changes</p>