

#### **EQUALITY IMPACT ASSESSMENT TOOL**

The council has a statutory duty to consider the impact of its decisions on age, disability, gender reassignment, pregnancy & maternity, race, religion or belief, sex (gender) and sexual orientation.

The Council also has a duty to foster good relations between different groups of people and to promote equality of opportunity.

Completing an Equality Impact Assessment (EIA) is the **simplest way** to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the **earliest stages** of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision. Keep all versions of your EIA. An EIA should be finalised once a final decision is taken.

#### When should you undertake an EIA?

- You are making changes that will affect front-line services
- You are reducing the budget of a service, which will affect front-line services
- You are changing the way services are funded and this may impact the quality of the service and who can access it
- You are making a decision that could have a different impact on different groups of people
- You are making internal reorganisations that will result in staff changes including Transfer of Undertakings (TUPE), redundancies, change in job roles or terms and conditions.
- EIAs also need to be undertaken on how a policy is implemented even if it has been developed by central government (for example cuts to grant funding)
- Section 1 of the EIA Tool: Initial Screening, will help you decide whether a full EIA is necessary

#### Who should undertake the EIA?

· The person who is making the decision or advising the decision-maker

#### **Further Guidance**

- Step-by-Step Guidance to the questions
- An EIA e-learning module is available for all Westminster staff: www.learningpool.com/westminster/course/view.php?id=159

Please contact the Equalities lead to inform them when you begin and then complete an EIA: equalities@westminster.gov.uk

SEB will monitor compliance with the requirement to complete EIAs.

Title of P	roposal
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Assessment of proposals to reduce level of front-line service provision at Housing Options Service that are above the contract level late (reflecting the increase in homelessness since 2010) in 2016/17.

#### **Lead Officer**

- (i) Rebecca Ireland
- (ii) Senior Housing Needs Manager
- (iii) Housing
- (iv) rireland@westminster.gov.uk

Has this project, policy or proposal had an EIA carried out on it previously? If yes, please state date of original and append to this document for information.

res   NO	Yes		No	
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#### Date of original EIA:

#### Version number and date of update

You will need to update your EIA as you move through the decision-making process. Record the version number here and the date you updated the EIA. Keep all versions so you have evidence that you have considered equality throughout the process.

Version 1: 4<sup>th</sup> November 2015

# **SECTION 1**: Initial screening: Do you need to complete an Equality Impact Assessment (EIA)?

Not all proposals will require an EIA, this initial screening will help you decide if your project or policy requires a full EIA by looking at the potential impact on any equality groups.

#### 1.1 What are you analysing?

The activity covered by this EIA relates to the provision of the Housing Options Service (HOS.) Since 2010 homelessness numbers have increased as the private rented sector market has become less affordable to households on benefits.

To respond to this uplift in demand, increased resources of c. £590K p.a. (following a successful bid to CLG via London Councils) are being put into HOS over and above the contract level in place when the contract was competitively tendered. This policy relates to the proposal to reduce this additional sum on the basis of a review of front-line service delivery.

This EIA does not focus on the work of HOS as a whole as this will be covered during future proposals to relet the contract.

1.2 From a service user and staff perspective, does the project, policy or proposal have the potential to <u>disproportionately</u> impact on any of the following

	groups? If so, is the impact positive or negative?					
		None	Positive	Negative	Not sure	
	Disabled people				$\boxtimes$	
	Particular ethnic groups				$\boxtimes$	
	Men or women (include impacts due to pregnancy/ maternity)					
	People or particular sexual orientation/s					
	People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment					
	People on low incomes				$\boxtimes$	
	People in particular age groups					
	Groups with particular faiths and beliefs					
	Are there any other groups that you think may be affected negatively or positively by this project, policy or proposal?					
	. , , ,					
The analysis of use of the Housing Options Service in meeting housing need (see section 2.1 below) highlights how the provision of services to meet housing need impacts across all groups.  The service positively impacts on these groups through meeting housing need with changes to the service being reviewed						
	If the answer is "negative"	or "upoloo"	' consider dei	ag a full EIA		

#### If the answer is "negative" or "unclear" consider doing a full EIA

1.3	What do you think that the overall	None / Minimal	Significant
	NEGATIVE impact on groups and	X	
	communities will be?		
	None or minimal impact would be where there is		
	no negative impact identified, or where there		
	will be no change to the services for any groups.		
	Wherever a negative impact has been identified		
	you should consider undertaking a full EIA by		
	completing the rest of the form.		

# 1.4 Using the screening and information in questions 1.2 and 1.3, should a full

	assessment be carried out on the project, policy or proposal?				
	Yes ⊠				
1.5	How have you come to this decision?				
	See section 2.1; the use of the HOS service is driven by the make-up of groups in housing need and in particular for the purposes of this EIA living in the private rented sector and in receipt of welfare benefits.				
	The analysis above highlights how the housing options service meets the needs of a wide range of diverse groups and changes to this should be fully audited				

# **SECTION 2: EQUALITY IMPACT ASSESSMENT Building an Evidence Base: What do you know?**

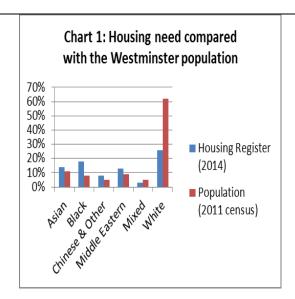
This section will help you build your evidence base and interpret what the likely impact will be of your service. Complete this section if your proposal is service user related. If your proposal only affects staff, go to section 2.2

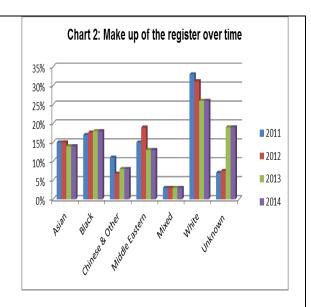
2.1	<ul> <li>Build up a picture of who uses/will use your service or facility and identify who are likely to be impacted by the proposal</li> <li>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</li> </ul>				
	How many people use the service currently? What is this as a % of Westminster's population?	See below			
	Disabled people	See below			
	Particular ethnic groups	See below			
	Men or women (include impacts due to pregnancy/maternity)	See below			
	People of particular sexual orientations	See below			
	People who are proposing to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	See below			
	People on low incomes	See below			
	People in particular age groups	See below			
	Groups with particular faiths and beliefs	See below			
	Any other groups who may be affected by the proposal?	See below			

The annual equalities analysis looks at demand for social housing so we understand our customers, and also at social housing lets, which help ensure our policies are not discriminatory.

#### Demand for housing in 2014

Only households with priority for housing under the Allocations Scheme are registered, so the profile of the housing register is driven by the eligibility criteria. Like previous years, certain ethnic groups (Black, Asian, Chinese and Other Middle Eastern) continued to have higher levels of housing need compared with their share of the population (see chart 1 below). White households continued to be under represented on the register in 2014 compared to their population share, making up 26% of need and 62% of the population



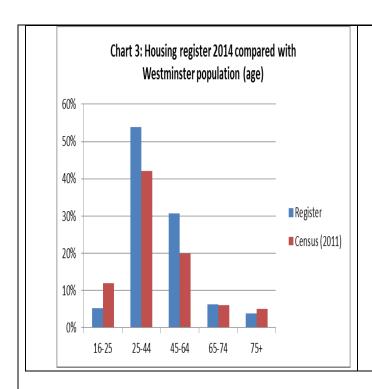


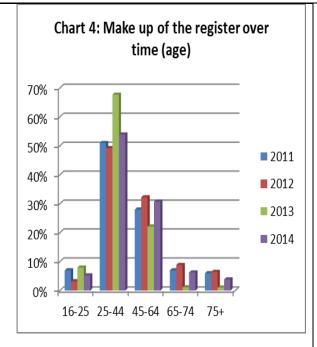
The profile of the register has changed over time – most notably the proportion of White households has fallen. In 2011 they made up 33% of the register compared with 26% in 2014. The proportion of households with an Unknown ethnic origin rose in 2013 and this continued in 2014.

Thirty six per cent of applicants needed three or more bedrooms, and some ethnic groups continued to have an above average need for them i.e. 53% of Asian and 50% of Middle Eastern households needed larger homes.

A higher proportion of women (66%) were lead applicants on the housing register compared with their 49% share of the population.

The 25-44 age group continued to make up the biggest share (54%) of the housing register in 2014, albeit at a lower proportion than in 2013 when they made up 68%. They also make up the largest group in the Westminster population at 42%. Older people (65 and over) are slightly under represented making up 10% of the register and 11% of the population – although their proportion on the register has fluctuated over time as chart 4 shows.





Less than 1% of households needed a fully wheelchair adapted property which is the same as the 2006 housing needs survey estimate for the overall Westminster's population.

#### Lets 2013/14

The proportion of lets to different groups during 2013/14 is unlikely to reflect the profile of the register as:

The make-up of the register changes over time and there is delay (often of many years) between registering for a property and a let due to supply shortages

There is a particular shortage of family sized units and studios and one bedrooms make up nearly 50% of the stock – so groups needing larger properties will inevitably wait longer

Households are prioritised for properties through a priority system and a quota of properties are let each year to each priority group

The majority of lets are through choice based lettings (CBL) so applicants can choose whether to bid for properties.

However comparing lets in 2013/14 with the profile of the register is still useful to ensure there are no major discrepancies.

As the following table shows, overall lets to most ethic groups were lower than their share of the register. This is with the exception of White groups where they were higher which is likely to be due to White groups making up a larger proportion of demand in the past (see chart 2) and by them having a greater need for smaller units which are more readily available.

#### Lets and ethnicity

Ethnicity	% Register 2014	% Lets 2013/14 (including CBL and direct offers)	Bids per let
Asian	14%	11%	119
Black	18%	14%	139
Chinese &			
Other	8%	8%	122

-	Average	20,0		122
-	White	26%	33%	78
	Unknown	19%	21%	126
	Mixed	3%	3%	182
	Middle Eastern	13%	10%	218

Most groups actively participated in CBL with Middle Eastern and Mixed groups making higher than average numbers of bids per let. White households made lower than average bids per let which is consistent with previous years' findings.

#### Age

The table below illustrates there was a higher proportion of lets to young people (16-24) compared with their proportion on the register in 2014 and a significantly lower proportion to the 25-44 age group which is likely to be due to the shortage of family sized units and a more readily available supply of studio/s and one bedroom properties. The proportion of lets to older people was higher than their proportion on the register which is due to the available supply of community supported housing.

There was a higher proportion of lets to young people (16-24) compared with their proportion on the register and a significantly lower proportion to the 25-44 age group. This is likely to be due to the greater availability of studios and one bedroom properties and a shortage of family sized units.

#### Lets compared with need by age

Age	% Register 2014	% All lets 2013/14	% CBL lets 2013/14	Lets per CBL let
16-24	5%	8%	6%	81
25-44	54%	43%	43%	183
45-64	31%	33%	37%	92
65-74	6%	9%	9%	33
75 plus	4%	8%	5%	32
Average				122

Previous reports have noted that younger and older age groups make below average bids per let and this continued in 2013/14 as the above table shows reflecting that there is greater availability of community supportive housing for older people. In addition support is available for anyone not bidding and people are contacted by the Housing Options Service if not participating and can be offered automated bidding.

This section should be completed for all proposals that will impact on staff.

2.2 Build up a picture of the makeup of the workforce profile in the service affected.

What is the workforce profile of the service? As a percentage, how does this compare to the profile of Westminster City Council workforce?

- Age
- Disability
- Gender
- Gender Reassignment
- Ethnicity
- Pregnancy and Maternity
- Religion/Belief
- Sex
- Sexual Orientation

Group Service		Council		
	No	%	No	%
Age				
16-24			35	2%
25-29			148	7%
30-44			893	43%
45-59			854	41%
60-64			115	5%
65 +			33	2%
Disability				
Yes			66	3%
No			897	43%
Not Known			1115	54%
Ethnicity				
Asian/Asian			145	7%
British				
Black/Black			416	20%
British				
Mixed			62	3%
White			1371	66%
Other			42	2%
Unknown			83	4%
Gender				
Female			1192	57%
Male			886	43%

#### **Pregnancy and Maternity**

- Are any staff pregnant or on maternity
- How are they affected by this change

#### **Religion & Belief**

There is insufficient data to make an assessment on this characteristic. Any issues identified as part of the consultation process will be included

#### **Sexual Orientation**

There is insufficient data to make an assessment on this characteristic. Any issues identified as part of the consultation process will be included

#### **Gender Reassignment**

Data on Gender Reassignment is currently not available but it is unlikely that this proposal will impact either positively or negatively on the protected characteristic of gender reassignment. The consultation process should identify any issues that need to be considered with regards to this protected characteristic.

Using the information above, are any groups of staff

n/a does not impact on Council employed staff

disproportionately represented compared to the Council workforce?	
Does TUPE apply to this proposal?	
Will the reorganisation/restructure result in an increase or decrease in staff numbers? If so, approximately how many?	
Will the reorganisation/restructure result in changes in job roles or terms and conditions for staff? If so, what changes are proposed?	

2.3	Summary (to be completed following analysis of the evidence above)						
	Does the project, policy or proposal	None	Positive	Negative	Not sure		
	have the potential to have a						
	disproportionate impact on any of						
	the following groups? If so, is the						
	impact positive or negative?						
	Disabled people						
	Particular ethnic groups						
	Men or women (include impacts due						
	to pregnancy/maternity)						
	People of particular sexual						
	orientations						
	People who are proposing to						
	undergo, are undergoing or have						
	undergone a process or part of a						
	process of gender reassignment						
	People on low incomes						
	People in particular age groups						
	Groups with particular faiths and						
	beliefs						
	Are there any other groups that						
	you think this proposal may affect						
	negatively or positively?						

## **SECTION 3: Assessing Impact**

In order to be able to identify ways to mitigate any potential impact it is essential that we know what those potential impacts might be.

#### 3.1 Consultation Information

This section should record the consultation activity undertaken in relation to this project, policy or proposal

The HOS conducts customer satisfaction surveys that consistently show satisfaction levels of above 90% (even during the recent increase in homelessness)

A service user improvement group made up of current and former users of HOS meets regularly to discuss the service and proposed policy changes.

# 3.2 What might the potential impact on individuals, groups or staff be? Consider disability, race, gender, sexual orientation, transgender, age, faith or belief and those on low incomes and other excluded individuals or groups

Generic impact (across all groups	See below
Men or women (include impacts	due See below
to pregnancy/maternity)	
People of particular sexual	See below
orientation	
People who are proposing to	See below
undergo, are undergoing or have	
undergone a process or part of a	
process of gender reassignment	
Disabled people	See below
Particular ethnic groups	See below
People on low incomes	See below
People in particular age groups	See below
Groups with particular faiths and	See below
beliefs	
Other excluded individuals and	See below
groups	

There will be no discrimination arising from the policy change as it relates to continuing to meet the Council's statutory housing obligations

HOS performs a statutory housing needs advice and assessment service for the Council and is thus accessible to all groups. This is underlined by the increase in numbers of homeless applications and acceptances since 2010 and illustrates the accessibility of the service. This is further supported by the fact that all individuals impacted by LHA caps were contacted directly and informed of the role of HOS and the support and assistance available.

n order to ensure that the service continues to remain accessible we will continue to emphasise the availability of appointments for housing advice and assessment at a convenient time for the household. We will emphasise the importance of making contact with the Housing Options Service at the earliest opportunity before any housing crisis occurs that would require attending the service on an emergency.

This will include promoting the use of e-mailing the Housing Options Service advisors directly and making contact through the website (which is currently increasing.)

We will promote the use of and access to the comprehensive WCC website which contains housing advice and information on the service and free access is available in libraries and one stop shops.

The emergency out of hours service for housing emergencies outside of the current opening hours will continue to be available.

### **SECTION 4: Reducing & Mitigating Impact**

As a result of what you have learned, what can you do to minimise the impact of the proposed changes on equality groups and other excluded / vulnerable groups, as outlined above?

4.1	the impact? (Remember to think ab	npact, what can be done to reduce or mitigate out the Council as a whole, another service area may in help to deal with any negative impact).
	If numbers of homeless applications and acceptances significantly increase then it will not be possible to reduce the level of service provision proposed and still meet the Council's statutory duties and continued commitment to work with Adults and Children's Services to support the most vulnerable.	Levels of homelessness will continue to be monitored closely monthly and this will inform future resource allocation

4.2	Now that you have considered the potential or ac action are you taking?	tual effect on equality, what
	No major change (no impacts identified)	Х
	Adjust the policy/proposal	
	Continue the policy/proposal (impacts identified)	
	Stop and remove the policy/proposal	
4.3	Please document the reasons for your decision	
	The implementation of the policy is dependent upon acconcreasing. As a result the policy will be adjusted acconcreased homeless households change during the year and is make basis.	rding to how numbers of
4.4	How will the impact of the project, policy or prop	osal and any changes made
	to reduce the impact be monitored?	
	Housing supply and needs data will continue to be monitor reported across the Council; any significant increases in deaccordingly	
4.5	Conclusion	
	This section should record the overall impact, who will be in taken to reduce/mitigate impact	npacted upon and the steps being
	As above there will be no discrimination arising from the po continuing to meet the Council's statutory housing obligation	•

## **SECTION 5: Next Steps**

5.1	Action Plan Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps.						
	NB. Add any additio	nal rows, if required					
	Action Required	Equality Groups Targeted	Intended Outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Continue to update the website and promote the use of direct e-mailing HOS officers and contact through the website	All	Households requiring housing advice do not need to 'drop-in' to HOS to receive this		Rebecca Ireland 020 7641 2029 rireland@westmins ter.gov.uk	30/03/2016	A
	Continue to advise households contacting the Housing Options Service of the option to make appointments to see housing advisors.	All	Households who make use of the Housing Options Service are able to make appointments	Within existing resources	Rebecca Ireland 020 7641 2029 rireland@westmins ter.gov.uk	30/03/2016	A

5.2 Ri	sk Table				
Ref	Risk	Impact	Actions in place to mitigate the risk	Current risk score	Further actions to be developed
R1.1	[Enter risk here]	[Enter here the likely impact if the risk came to pass]	[Record here any actions already in place to reduce the risk]	[Using the key below, enter the current risk score]	[Enter here any actions that can be developed in future to reduce the risk identified]



THIS SECTION TO BE COMPLETED BY THE RELEVENT SERVICE MANAGER
Signature:
Full Name:
Unit:
Email & Telephone Ext:
Date of Completion (DD/MM/YY):

#### WHAT NEXT?

Please email your completed EIA to the Equalities Lead: equalities@westminster.gov.uk