



EQUALITY IMPACT ASSESSMENT TEMPLATE

PLEASE ENSURE YOU READ THE GUIDANCE NOTES BEFORE COMPLETING THIS TEMPLATE

Completing an 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.

SECTION 1:

<p>Title</p>	<p>Policy for Leaseholders in Housing Renewal Areas 2018</p>
<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the policy/project/activity/strategy looking to achieve? • Who is it intended to benefit? Are any specific groups targeted by this decision? • What results are intended? 	<p>Background</p> <p>In 2010, the council published a Housing Renewal Strategy¹, setting out the need for housing renewal in some areas in order to: increase and improve the quality of affordable housing; improve the local environment; promote high quality of life; enable people to maximise economic opportunity; and create a more distinct sense of neighbourhood, ending the physical divide between Westminster’s estates and the surrounding local area.</p> <p>A number of priority housing renewal areas were identified and these are at different stages. They are the Tollgate Gardens and Ebury Bridge Estates and in the Church Street/Edgware Road area.</p> <p>The Housing Strategy: Direction of Travel Statement 2015 set out the intention to make housing renewal business as usual. Therefore, it could take place in other areas in future.</p> <p>Housing renewal typically involves the acquisition of leasehold properties and the development of new properties for private sale and use as affordable housing.</p> <p>What this Equalities Impact Assessment (EIA) is evaluating</p> <p>This EIA evaluates the council’s Policy for Leaseholders in Housing Renewal Areas August 2018. The Policy sets out the rehousing options for leaseholders and general support available to them, where the council wants to acquire their properties for the purpose of housing renewal.</p>

¹ file:///Q:/wcc_housing_renewal_report2010_lowres%20(11).pdf

The original Policy was completed in 2014 and was accompanied by a full EIA. Overall, the updated Policy improves the offer to leaseholders. It was consulted on during November 2017 – January 2018.

This EIA evaluates the whole updated Policy, not just those parts that have been changed, as it is timely to consider the impact of the Policy on different groups again.

It does not evaluate the principle of housing renewal, but the rehousing options for leaseholders once the decision to regenerate has been agreed, and how they will impact on different groups.

This EIA considers the equality impact of the Policy in general terms. The specific proposals for each scheme will be the subject of further EIAs that will take into account the specific circumstances of each scheme.

For example, a link to the initial EIA for proposed option on the Ebury Bridge Estate is below:

<http://committees.westminster.gov.uk/documents/s28553/Bckground%20Paper%20-%20Ebury%20Bridge%20EQIA.pdf>

The aims of the Policy

It is recognised that leaseholders can be adversely impacted by housing renewal where their property is subject to acquisition by the council. These adverse impacts may include displacement from the renewal area, inability to purchase an equivalent property and an increase in housing costs.

Through the Policy, the council seeks to mitigate these adverse consequences. Its aims are to:

- Provide a range of rehousing options to enable leaseholders to stay in the local area and in their communities
- Provide other rehousing options and support for those that do not want to remain in the housing renewal
- Enable leaseholders to remain as home owners where possible
- Support leaseholders through an unsettling and difficult process – particularly those that are vulnerable
- Provide a fair offer to leaseholders, which is also financially deliverable, and which doesn't compromise the overall viability of housing renewal schemes.

Key features of the Policy

There are a range of options to enable resident leaseholders to remain in, or return to, the housing renewal area – they can:

- Buy one of the new build homes with an equity loan, or on a shared equity basis, with no repayments on council's contribution to the purchase. The council contributes the difference between the leaseholder's contribution (of the market value of the original home, plus their home loss payment) and the market value of the new home. The equity loan or shared equity sum contributed by the council is repayable on the sale of the property. Any uplift or decrease in the value of the property is shared between the leaseholder and the council proportionate to their respective percentage contributions.
- Buy one of the new homes on a shared ownership basis if they do not meet the criteria for the equity loan/shared equity product.
- Buy one of the new homes outright, if the leaseholder wants and is able to raise sufficient finance.
- Receive help to identify a property in the housing renewal which is not being acquired, that is for sale, or in some cases the council will sell them a property from its own stock.
- Become a social or intermediate housing tenant in the housing renewal area in some cases.
- In addition, the Policy sets out the council's general commitments in relation to temporary accommodation, that leaseholders may need to move into, before the new properties within the renewal area are ready for occupation.

Other options:

- There is practical help for leaseholders to buy outside the housing renewal area, if this is their choice i.e. around the process of buying on the open market. There is also financial help in some limited circumstances to buy another property close to the housing renewal area.

Support:

All resident leaseholders will have access to independent advice to help them make a decision about their rehousing.

There are no options for non-resident leaseholders, other than to sell to the council and receive statutory compensation.

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	<p>The main changes from the original Policy are:</p> <ul style="list-style-type: none"> ○ There is a new option to buy one of the new homes on a shared equity basis – which is similar to an equity loan. This is for stations where the leaseholder might be purchasing a new property directly from the council. ○ There is more ability for leaseholders to pass on the equity loan/shared equity arrangement to their heirs. ○ Leaseholders taking up the equity loan/shared equity option are now entitled and expected to hold their own capital from the sale of their home to the council, if the new properties are not ready to move into straight away. ○ Leaseholders that are eligible to become tenants will be offered an intermediate tenancy rather than a tenancy at a social rent, where this is affordable for them (intermediate tenancies have higher rents and will be offered to eligible leaseholders with higher incomes). <p>In developing the Policy the council has to also consider its wider fiduciary duties towards Council Tax payers and has to ensure that its rehousing offer to leaseholders is affordable and doesn't compromise the overall viability of any scheme.</p>
<p>Details of the lead person completing the screening/EIA</p>	<p>(i) Full Name: Cecily Herdman</p> <p>(ii) Position: Principal Policy Officer</p> <p>(iii) Unit: Policy, Performance and Communications</p> <p>(iii) Contact Details: cherdman@westminster.gov.uk</p>
<p>Date sent to Equalities@westminster.gov.uk</p>	
<p>Version number and date of update</p>	<p>3</p>
<p><i>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. However <u>only</u> the most updated version will be saved in the Equalities SharePoint folder.</i></p>	

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SECTION 2: Do you need to complete a full Equality Impact Assessment (EIA)?

Not all proposals will require a full EIA, the assessment of impacts should be proportionate to the nature of the project/policy in question and its likely impact. To decide on the level of detail of the assessment required consider the potential impact on persons with protected characteristics.

2.1	<p>Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal</p> <ul style="list-style-type: none"> • <i>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.</i> • <i>Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal</i>
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<p>How many people use the service currently? What is this as a % of Westminster's population?</p>	<p>The policy could be applied to any housing renewal area across the council, current and future, so it could potentially apply to any leaseholder.</p> <p>There are 9,000 council leasehold properties and of these 5,600 are estimated to be occupied by resident leaseholders, which are 7.5% and 4.6%² of all Westminster households respectively.</p> <p>It is considered that the potential adverse impacts of housing renewal are greater in relation to resident leaseholders than non-resident leaseholders, since residents stand to lose their home rather than an investment. Resident leaseholders are also the main focus of the Policy. Therefore, the main focus of this EIA is on resident leaseholders.</p> <p>The profile of resident leaseholders is estimated in the following tables, using "modelled" data from the council's annual City Survey. (The council does not hold specific data on the profile of its leaseholders).</p> <p>In this survey, a sample of residents across Westminster were interviewed, of which (120 out of the 2630) were resident leaseholders, and this data has been used to make assumptions about <i>all</i> resident leaseholders. This means that 2.1% of resident leaseholders were captured in City Survey.</p> <p>As the Policy is likely to be implemented firstly at the Ebury Bridge Estate and in the Church Street/Edgware Road area - where regeneration plans are progressing – local data on <i>all</i> residents in these areas are included in tables below, to help understand the possible profile of resident leaseholders in these areas.</p> <p>The aim is for the actual profile of all residents in renewal areas to be captured over time and this process has started. Such data once collected will be used to prepare EIAs on specific schemes.</p> <p>At the time of writing, the Policy might apply to 130 leaseholders at Ebury and 198 at Church Street/Edgware Road under current proposals (i.e. where their properties have been identified for acquisition) which is an estimated 39% and 28% of all the respective local households in these housing renewal areas.</p>
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² There are 120,000 households in Westminster according to 2016 ONS predictions

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Gender	City Survey 2017		Westminster Population (Mid-year population estimates)	Local population in live regeneration areas		
	GENDER	All Respondents %	Council leaseholders %	Ebury	Church Street	
	Male	52%	50%	52%	49%	50%
	Female	48%	50%	48%	51%	50%

Race	City Survey 2017		Census 2011	Local population in live regeneration areas	
	ETHNICITY	All Respondents %	Westminster population	Ebury	Church Street
White	68%	83%	62%	59%	38%
Black	9%	3%	7%	11%	14%
Asian	13%	11%	12%	12%	22%
Mixed	4%	1%	5%	6%	6%
Arab	5%	1%	7%	6%	14%
Other	1%	1%	7%	6%	6%

The data suggests that council leaseholders are more likely to be White and less likely to be Black. The local data suggests that certain ethnic groups may be over represented amongst leaseholders. At Ebury, this may be case for Black households and at Church Street this may be the case for Asian and Arab households.

Disability	City Survey 2017		Census 2011	Census 2011 ALL HOUSEHOLDS	
	HEALTH	All Respondents %	Westminster population	Ebury*	Church Street
Very good	34%	23%	54%	49%	43%
Good	51%	54%	30%	30%	32%
Fair	13%	22%	10%	13%	16%
Bad/very bad	2%	1%	6%	8%	9%
DISABILITY					
Day to day activities limited a lot	3%	3%	7%	8%	12%

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	City Survey 2017		Census 2011	Census 2011 ALL HOUSEHOLDS	
HEALTH	All Respondents %	Council leaseholders %	Westminster population	Ebury*	Church Street
Member of household has a disability	10%	15%			
CARER					
No	96%	94%	93%	90%	90%
Yes	4%	6%	7%	10%	10%

*Lower super output area

The data suggests that there may be a higher proportion of leaseholders a member of whose household has a member with a disability than in the local population generally. Lower proportions of council leaseholders describe their health as very good but higher proportions describe it as fair than the overall population. The data from Church Street suggests that there may be a higher proportion of leaseholders where household members are limited in their day to day activities.

Sexual orientation

The council does not record include information about the sexual orientation in its City Survey. Similarly there is no reliable estimate of the number of persons proposing to undergo, is undergoing or has undergone gender reassignment. It is estimated, that up to 10% of the Westminster population may be gay, lesbian, bi sexual or transgender (LGBT)³. This can be compared with the 2016 Annual Population Survey for the UK which found that 2% of the population identified themselves as lesbian, gay, bi sexual or other.

Applying the Westminster estimate to leaseholders, this suggests that 900 might be LGBT across Westminster and 33 at Ebury and 1,200 at Church Street/Edgware Road.

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Age	City Survey 2017		ONS Mid year population estimates 2016	Local population in live regeneration areas (ONS Mid-year population estimates 2016)	
	All Respondents %	Council leaseholders %	Westminster population	Ebury	Church Street (Ward)
AGE					
Under 16			17%	25%	23%
16 - 24	13%	4%	11%	9%	12%
25 - 34	19%	8%	22%	18%	16%
35 - 44	24%	18%	17%	18%	15%
45 - 54	19%	30%	13%	12%	13%
55 - 64	11%	11%	9%	8%	9%
65 - 74	10%	21%	6%	6%	6%
75+	3%	7%	5%	4%	6%

Council leaseholders are more likely to be older than the Westminster population. Supplementary data from Ebury and Church Street/Edgware Road indicates that 27% and 24% of leaseholders respectively are original right to buy purchasers, which also suggests that they may be older and not have not have purchased on the open market before.

While the local data for Ebury and Church Street/Edgware Road indicates a younger population than the Westminster average, this is unlikely to apply to leaseholders given home owners tend to be older. The average age of a first time buyer in 2015/16 was 32⁴.

Pregnancy and maternity/children in household	City Survey 2017		Census 2011 – dependent children only	Census 2011 ALL HOUSHOLDS	
	All Respondents %	Council leaseholders %	Westminster population	Ebury	Church Street
CHILDREN IN HOUSEHOLD					
Yes	31%	33%	19%	16%	32%
No	69%	67%	81%	84%	68%
				Live birth tables 2015	
Pregnant			1990	Data not available	175

⁴ English House Condition Survey 2015/16.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/626887/First_Time_Buyers_report.pdf

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Religion or belief	City Survey 2017		Census 2011	Census 2011 ALL HOUSEHOLDS	
	RELIGION AND BELIEF	All Respondents %	Council leaseholders %	Westminster population	Ebury
Christian	Data not available	Data not available	45%	55%	36%
Buddhist			1%	1%	1%
Hindu			2%	1%	1%
Jewish			3%	1%	1%
Muslim			18%	13%	42%
Sikh			<1%	<1%	<1%
Other			<1%	1%	1%
None			20%	20%	11%
None stated			9%	9%	8%

Local data suggests that Christian households might be over represented amongst Ebury leaseholders and Muslim households might be over represented amongst those at Church Street/Edgware Road.

Economic activity	City Survey 2017		Benefit claimants	Benefit claimants	
	WORKING (Working age population)	All Respondents %	Council leaseholders %	Westminster population	Ebury
Full time	50%	54%		Information not available	
Working part time/apprentices	10%	8%			
Not working	37%	37%			
				NOMIS data for Churchill ward 2016	NOMIS data 2016
Claiming workless benefits (those aged 16-64)			9%	15%	20%

Given that property prices in Westminster are amongst some of the highest in London and because those impacted by the Policy are home owners, it is unlikely that high numbers of leaseholders will have low incomes (defined by being in receipt of benefits). However, any leaseholder can have had a change in their circumstances, and those that bought under the

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	right to buy may have lower incomes than those that have purchased on the open market, because they purchased at a discount and as families can pool resources in order to purchase.
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2.2 Are there any groups with protected characteristic that are overrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service.

If yes, provide details.

Overall council leaseholders compared with the overall Westminster population, are:

More likely to be/have:

- A disabled member of the household (15% compared with 10% of the overall population)
- White (83% - compared with 68% of the overall population)
- Older (28% are 65 and over - compared with 13% of the overall population)
- Describe their health as “fair” (22% compared with 13% of the overall population, as opposed to very good/good or bad. They were less likely to describe their health as very good – 23% described their health in this way compared with 34% of the overall population)
- Working full time (54% compared with 50% of the overall population)

Some of these over representations are relatively small, the most significant are council leaseholders are more likely to have a disabled member of their household, be White, older and working full time than the overall population.

The local data (for Ebury and Church Street/Edgware Road) in the tables is for *all* households so is unlikely to be fully representative of resident leaseholders. However it does provide some insights into the *possible* demographic of leaseholders in these areas and issues to take account of.

Local over representations compared to Leaseholder averages	
Ebury	Church Street/Edgware Road
<ul style="list-style-type: none"> • Higher proportion in bad health (small over representation) 	<ul style="list-style-type: none"> • Higher proportion in bad health (small over representation)
	<ul style="list-style-type: none"> • Higher proportion with day to day activities limited by disability (small over representation)
<ul style="list-style-type: none"> • More likely to be carers (small over representation) 	<ul style="list-style-type: none"> • More likely to be carers (small over representation)
<ul style="list-style-type: none"> • More likely to be of Black ethnic origin (small over representation) 	<ul style="list-style-type: none"> • More likely to be of Black, Asian and Arab ethnic origin
<ul style="list-style-type: none"> • Higher Christian population 	<ul style="list-style-type: none"> • Higher Muslim Population
	<ul style="list-style-type: none"> • More likely to have children in the household

2.3 Are there any groups with protected characteristics that are underrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the service

If yes, provide details.

Overall council leaseholders are less likely compared with the overall Westminster population to be:

- Black – (3% - compared with 9% of the overall population)
- From the Arab ethnic group (1% - compared with 5% of the overall population)
- Describe their health as very bad (1% - compared with 2% of the overall population)
- Younger (12% - compared with 32% of the overall population)

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may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.

2.4

Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?

	None	Positive	Negative	Not sure
Men or women	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disabled ⁵ people (consider different types of physical, learning or mental disabilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of particular sexual orientation/s	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People in particular age groups (consider in particular children, under 21s and over 65s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People who are intending to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Impact due to pregnancy/ maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of particular faiths and beliefs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People on low incomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

If any of the answers to the questions above is, “negative” or “unclear” you will need to undertake a detailed impact assessment.

⁵ Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

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2.5	Based on your responses, should a full, detailed EIA be carried out on the project, policy or proposal
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2.6	Provide brief reasons on how have you come to this decision?
	<p>As there are potentially both positive <i>and</i> negative impacts.</p> <p>As set out further in Section 3, the design of the Policy seeks to help mitigate these negative consequences.</p>

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SECTION 3: ASSESSING THE 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. Using the evidence gathered in section 2, explain what the potential impact of your proposal might be on the groups you have identified. You may wish to further supplement the evidence you have gathered using the table below in order to properly consider the impact.

3A General principles

Positive impacts – which might apply to all leaseholders

1. Every leaseholder will have access to independent advice to discuss their options and this will be done in a way suited to their needs
2. The Policy will be communicated in an accessible way and there will be a named contact
3. Practical help and support will be available for leaseholders as it is needed – for example this might include detailed support for older and vulnerable leaseholders that have never bought on the open market before
4. Any changes to the policy will generally be consulted on – unless they are favourable to leaseholders or required by legislation
5. The Policy includes general principles that will be applied across all schemes, rather than setting out detailed processes which can become out of date
6. There is an appeals process and discretion can be applied in exceptional circumstances

Negative impacts – these might impact on all leaseholders

1. When the Policy was consulted on, there were a number of questions from leaseholders about processes that are not covered in it, such as when the Policy will be implemented and how will the new homes be allocated.
2. Some consultees said the proposed Policy was complicated and hard to understand. This might have more of any impact on leaseholders that are vulnerable

*The negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population. It is assessed as **medium** if the impact would have a greater impact on the group than it would do the overall population, or the group is over represented amongst leaseholders. The impact is assessed as **high** if the impact would have a greater impact on the group than it would do the overall population to the extent that it might result in discrimination and the group is over represented amongst leaseholders

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Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Section 3A: General principles (See above for more about positive and negative impacts)								
Gender	Men	X	X	x	1 – 2 (Low)		<ul style="list-style-type: none"> • Make one to one advice available to answer detailed questions • Communicate detailed processes/information on a scheme by scheme basis • Produce simple summary document 	<ul style="list-style-type: none"> • Policies are being developed to address leaseholder charges and costs in blocks identified for acquisition (so leaseholders are not paying for works which they will not benefit from) • There is a similar offer to tenants to remain in the local area and this policy is also being updated
	Women	X	X	x	1 – 2 (Low)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
Race	White	X	X	x	1 - 2 (Medium)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
	Mixed/Multiple ethnic groups	X	X	x	1 - 2 (Low)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
	Asian/Asian British	X	X	x	1 – 2 (Medium) Given Church Street population)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above
	Arab	x	x	x	1 – 2 (Medium)		<ul style="list-style-type: none"> • As above 	<ul style="list-style-type: none"> • As above

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					Given Church Street population)			
	Black/African/Caribbean/Black British	X	X	x	1 – 2 (Medium) Given Ebury and Church Street populations		• As above	• As above
	Gypsies / travellers	N/A	N/A		N/A			
	Other ethnic group	X	X	x	1 – 2 (Low)		• As above	• As above
Disability	Physical	X	X	x	1 – 2 (Medium)		• As above plus tailored one to one sessions	• As above
	Sensory	X	X	x	1 – 2 (Medium)		• As above plus tailored one to one sessions	• As above
	Learning Difficulties	X	X	x	1 – 2 (Medium)		• As above plus tailored one to one sessions	• As above
	Learning Disabilities	X	X	x	1 – 2 (Medium)		• As above plus tailored one to one sessions	• As above
	Mental Health	X	X	x	1 – 2 (Medium)		• As above plus tailored one to one sessions	• As above
Sexual Orientation	Lesbian, gay men, bisexual	X	X	x	1 – 2 (Low)		• As above	• As above
Age	Older people (50+)	X	X	x	1 - 2 (Medium)		• As above	• As above
	Younger people (16 - 25)	X	X	x	1 – 2 (Low)		• As above	• As above

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	Children	x	x	x	N/A		N/A	N/A
Gender Reassignment		X	X	X	1 – 2 (Low)		• As above	• As above
Impact due to pregnancy/maternity		X	X	X	1 – 2 (Low)		• As above	• As above
Groups with particular faiths and beliefs		x	X	x	1 – 2 (Medium) Given Church Street and Ebury populations		• As above	• As above
People on low incomes					1 (Low)		As above	• As above
		x	x	x				

Section 3B: Option to buy with an equity loan or on a shared equity basis

Positive impacts – which will apply to all leaseholders

1. This option enables leaseholders to remain in the housing renewal area and their communities, to buy one of the brand new homes and have similar housing costs as they do now. There is some provision to pass on this arrangement to family members which helps to contribute towards a settled community. To qualify, leaseholders need to contribute the value of their current home, plus their statutory home loss payment. Older leaseholders without mortgages should not be disadvantaged – as the criteria does not require a mortgage to be raised if the leaseholder owned without one. Over the medium term, leaseholders will have a new property, with modern space standards and amenities. The new home will have lower running costs, being built to higher standards of energy efficiency and be less likely in the short to medium term to require significant spending on maintenance and repair. Properties identified for redevelopment are in locations where significant investment is required to maintain their value. A share of that cost would need to have been met by leaseholders
2. Any disabled adaptations will be reinstated in the new home by the council
3. Every leaseholder will have access to independent advice to discuss this option and this will be done in a way suited to their needs. Practical help and support will be available for leaseholders as it is needed

Negative impacts – which might impact on all leaseholders

1. Buying with an equity loan, or on a shared equity basis, can never totally replicate the outright ownership leaseholders have now, as it means the council having a charge on the property, which is more restrictive
2. There is inheritance provision for resident family members, but again this is more restrictive than leaseholders' current rights and people living in one bedroom homes (older people for example) are less likely to benefit from the inheritance rights. Some consultees thought that there should be no restrictions on inheritance. However, the provision of an equity loan or

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shared equity by the council represents a significant investment of the council's funds. The council wishes to target its limited resources at rehousing displaced resident leaseholders and family members who live with them. Allowing unlimited inheritance would postpone recoupment of the council's investment indefinitely

3. Although some flexibility has been made to the eligibility criteria, some leaseholders that have had a significant drop in their income might not be eligible for this option and this may be more likely to impact on older people (that might find it harder to raise another mortgage due to lending criteria, or those with changed circumstances, due to illness or disability). While research suggests that the average age when a mortgage is paid off is 57⁶, which indicates this would not be such an issue for older people, as they will be mortgage free, other research, commissioned by Zopa, has found that people might not be debt free (including all debts) until they are 69⁷
4. The full home loss payment needs to be contributed to meet the eligibility criteria and some consultees thought this was unfair as it is compensation. The council did consider the financial impact of the home loss payment not being contributed, but decided that the impact would be material and it could risk the overall viability of any scheme
5. There might be higher service charges and council tax in the new homes (although this has to be off set against the new homes being more energy efficient). This might be more of an issue for households with low and fixed incomes, due for example to age or disability

*The negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population. It is assessed as **medium** if the impact would have a greater impact on the group than it would do the overall population or the group is over represented amongst leaseholders. The impact is assessed as **high** if the impact would have a greater impact on the group than it would do the overall population to the extent that it might result in discrimination and the group is over represented amongst leaseholders

1. ⁶ www.yourmortgage.co.uk/news/mortgage-paid-off-next/

⁷ <https://business-reporter.co.uk/2016/02/03/britons-become-debt-free-12-years-later-than-they-expect/#gsc.tab=0>

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Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Section 3B: Option to buy with an equity loan or on a shared equity basis (See above for more about positive and negative impacts)								
Gender	Men	X	X	x	Low (1 – 5)		<ul style="list-style-type: none"> Communicating the other options which are available to stay in the area 	<ul style="list-style-type: none"> Policies are being developed to address leaseholder charges and costs in blocks identified for acquisition (so leaseholders are not paying for works which they will not benefit from) Service charges or Council Tax might be higher in the new properties although fuel bills should be lower) There is a similar offer to tenants to remain in the local area and this policy is also being updated
	Women	X	X	x	Low (1- 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
Race	White	X	X	x	Medium (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Mixed/Multiple ethnic groups	X	X	x	Low (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above

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	Asian/Asian British	X	X	x	Medium (1 – 5) Given Church Street population		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Arab	x	x	x	Medium (1 – 5) Given Church Street population		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Black/African/Caribbean/ Black British	X	X	x	Medium (1 – 5) Given Ebury and Church Street populations		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Gypsies / travellers	N/A	N/A		N/A		N/A	N/A
	Other ethnic group	X	X	x	Low (1 – 5)		<ul style="list-style-type: none"> As above 	
Disability	Physical	X	X	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> As above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above
	Sensory	X	X	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> As above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above

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	Learning Difficulties	X	X	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> As above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above
	Learning Disabilities	X	X	x	Low (1,2,4,5) Medium (3,5)		<ul style="list-style-type: none"> A above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above
	Mental Health	X	X	x	Low (1,2,4,5) Medium (3,5)		<ul style="list-style-type: none"> A above plus: Consider application of flexibility to the criteria on cases by case basis, if new mortgage cannot be raised to same value. Make available financial advice 	<ul style="list-style-type: none"> As above
	Lesbian, gay men, bisexual	X	X	x	Low (1 – 5)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Older people (50+)	X	X	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> As above plus: Consider application of flexibility to the criteria on case by case basis, if new mortgage cannot be raised to same 	<ul style="list-style-type: none"> As above

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							<ul style="list-style-type: none"> value. Make financial advice available • Include some time limited inheritance provision for non resident family members in policy 	
	Younger people (16 - 25)	X	X	x	Low (1-5)		<ul style="list-style-type: none"> • As above 	
	Children	X	X	X	N/A		N/A	
Gender Reassignment		X	X	x	Low (1-5)		<ul style="list-style-type: none"> • As above 	
Impact due to pregnancy/maternity		X	X	x	Low (1,2,4) Medium (3,5)		<ul style="list-style-type: none"> • As above plus: • Consider application of flexibility to the criteria on case by case basis, if new mortgage cannot be raised to same value. Make financial advice available 	
Groups with particular faiths and beliefs		x	X	x	Medium (1-5) Given Ebury and Church Street populations		<ul style="list-style-type: none"> • As above 	

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<p>People on low incomes</p>	<p>x</p>	<p>x</p>	<p>x</p>	<p>Low (1,2,4) Medium (3,5)</p>		<ul style="list-style-type: none"> As above plus make financial advice available 	
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Section 3C: Arrangements when the new homes are not ready to move into straight away

This involves the offer of temporary accommodation as close to the housing renewal area as possible until the new homes are ready to purchase. Costs will be up to current housing costs. It also involves the leaseholder holding their capital from the sale of their home until the new purchase can take place.

Positive impacts - these will generally apply to all leaseholders

1. There will be a reasonable offer of temporary accommodation – that will take into account the location of support networks etc, which will be of particular benefit to households with children, those with disabilities etc.
2. Any disabled adaptations will be reinstated in the temporary accommodation

Negative impacts – these might apply to any leaseholder unless stated

1. Leaseholders will not be able to draw down on their mortgage for the period in temporary accommodation
2. All temporary accommodation offers will be reasonable, but there could be circumstances when local support is disrupted (that might have been provided by someone next door for example) - and this might impact more on households with children, carers, who are more likely to be women, those with disabilities and older people.

*The negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population. It is assessed as **medium** if the impact would have a greater impact on the group than it would do the overall population or the group is over represented amongst leaseholders. The impact is assessed as **high** if the impact would have a greater impact on the group than it would do the overall population to the extent that it might result in discrimination and the group is over represented amongst leaseholders

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Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Section 3C: Arrangements when the new homes are not ready to move into straight away (See above for more about positive and negative impacts)								
Gender	Men	X	X		Low (1 - 2)		<ul style="list-style-type: none"> Leaseholders will hold their own capital, which attracts a better rate of interest than if the council held it. This can be used towards mortgage 	
	Women	X	X		Low (1) Medium (2)		<ul style="list-style-type: none"> As above 	
Race	White	X	X		Medium (1 - 2)		<ul style="list-style-type: none"> As above 	
	Mixed/Multiple ethnic groups	X	X		Low (1 - 2)		<ul style="list-style-type: none"> As above 	
	Asian/Asian British	X	X		Medium (1 - 2) Given Church Street population		<ul style="list-style-type: none"> As above 	

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	Arab	x	x		Medium (1 - 2) Given Church Street population		<ul style="list-style-type: none"> As above 	
	Black/African/Caribbean/Black British	x	x		Medium (1 - 2) Given the Ebury and Church Street populations		<ul style="list-style-type: none"> As above 	
	Gypsies / travellers	N/A	N/A		N/A		N/A	
	Other ethnic group	x	x		Low (1 - 2)		<ul style="list-style-type: none"> As above 	
Disability	Physical	x	x		Low (1) Medium (2)		<ul style="list-style-type: none"> As above plus: Officers will work closely with them on the location of the temporary housing Leaseholders can find their own temporary housing in some cases 	
	Sensory	x	x		Low (1) Medium (2)		<ul style="list-style-type: none"> As above plus: Officers will work closely with them on the location of the temporary housing Leaseholders can find their own temporary housing in some cases Independent financial advice will be available around holding capital 	
	Learning Difficulties	x	x		Low (1) Medium (2)		<ul style="list-style-type: none"> As above plus: 	

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							<ul style="list-style-type: none"> • Officers will work closely with them on the location of the temporary housing • Leaseholders can find their own temporary housing in some cases • Independent financial advice will be available around holding capital 	
	Learning Disabilities	X	X		Low (1) Medium (2)		<ul style="list-style-type: none"> • As above plus: • Officers will work closely with them on the location of the temporary housing • Leaseholders can find their own temporary housing in some cases • Independent financial advice will be available around holding capital 	
	Mental Health	X	X		Low (1) Medium (2)		<ul style="list-style-type: none"> • As above plus: • Officers will work closely with them on the location of the temporary housing • Leaseholders can find their own temporary housing in some cases • Independent financial advice will be available around holding capital 	
Sexual Orientation	Lesbian, gay men, bisexual	X	X		Low (1 - 2)		<ul style="list-style-type: none"> • As above 	
Age	Older people (50+)	X	X		Low (1)		<ul style="list-style-type: none"> • As above plus: 	

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					Medium (2)		<ul style="list-style-type: none"> • Officers will work closely with them on the location of the temporary housing • Leaseholders can find their own temporary housing in some cases • Independent financial advice will be available around holding capital 	
	Younger people (16 - 25)	X	X		Low (1)		<ul style="list-style-type: none"> • As above 	
	Children	x	x		Medium (2)		<ul style="list-style-type: none"> • Officers will work closely with leaseholders on the location of the temporary housing • Leaseholders can find their own temporary housing in some cases 	
Gender Reassignment		X	X		Low (1)		<ul style="list-style-type: none"> • As above 	
Impact due to pregnancy/maternity		X	X		Low (1) Medium (2)		<ul style="list-style-type: none"> • As above plus: • Officers will work closely with them on the location of the temporary housing • Leaseholders can find their own temporary housing in some cases 	
Groups with particular faiths and beliefs		x	X		Medium (1 – 2) Given Ebury and Church Street populations		<ul style="list-style-type: none"> • As above 	
People on low incomes					Low (1 – 2)		<ul style="list-style-type: none"> • As above 	

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Section 3D: Other rehousing options

Positive impacts

1. There are other options for leaseholders to remain in the housing renewal area (or close to it) for example if they are not eligible for the equity loan/shared equity offer – they can buy one of the new properties as a shared owner if they can purchase a 25% share, and meet other housing costs. They may also receive support from the council to buy another property in the area, which is for sale and is of the same value, or in some cases buy a property from the council's own stock. This option would benefit those wanting to stay in the local area but don't want to move twice, which would be particularly disruptive for those with children in the households or people with disabilities etc. In some circumstances leaseholders can buy close to the housing renewal with financial assistance from the council, if for some reason the equity loan/shared equity or shared options were not suitable for them, and they needed to remain locally to maintain support networks
2. Subject to an eligibility criteria – a social or an intermediate tenancy will be offered to leaseholders, where home ownership is no longer suitable for them because for example due to their age or health and or financial situation. The type of tenancy (social or intermediate) will depend on the leaseholders income – intermediate tenancies will only be offered to those with higher incomes

Negative impacts

1. Where a leaseholder is eligible to become an intermediate tenant, rather than a social one – the tenancy offered is likely to be a shorthold assured one, which offers less security than a social tenancy (and some providers only renew them in certain circumstances or offer them for a fixed term). They offer less security than a leaseholder will have now as a home owner. Having to pay an intermediate rent may lead to some leaseholders having higher housing costs than before. This might particularly impact households with children, older people and those with disabilities. However, a tenancy is only likely to be offered in limited circumstances and where the home ownership options are not appropriate for the leaseholder and intermediate tenancies are offered subject to the being affordable on the leaseholder's income.

* The negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population. It is assessed as **medium** if the impact would have a greater impact on the group than it would do the overall population or the group is over represented amongst leaseholders. The impact is assessed as **high** if the impact would have a greater impact on the group than it would do the overall population to the extent that it might result in discrimination and the group is over represented amongst leaseholders

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Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Section 3D: Other rehousing options (See above for more about positive and negative impacts)								
Gender	Men	X	X	X	1 (Low)		<ul style="list-style-type: none"> Only offer intermediate tenancies, where the aim is to renew them (i.e. where they are not offered for a fixed term only) 	<ul style="list-style-type: none"> The council may develop a new policy on intermediate rent tenancies setting out when they will be renewed
	Women	X	X	X	1 (Low)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
Race	White	X	X	X	1 (Medium)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Mixed/Multiple ethnic groups	X	X	X	1 (Low)		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Asian/Asian British	X	X	X	1 (Medium) Given Church St population		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Arab	x	x	x	2 (Medium) Given Church St population		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above
	Black/African/Caribbean/Black British	X	X	X	1 (Medium) Given Ebury and Church Street populations		<ul style="list-style-type: none"> As above 	<ul style="list-style-type: none"> As above

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	Gypsies / travellers	N/A	N/A	N/A		N/A	N/A	N/A
	Other ethnic group	X	X	X	1 (Low)		• As above	• As above
Disability	Physical	X	X	X	1 (Medium)		• As above	• As above
	Sensory	X	X	X	1 (Medium)		• As above	• As above
	Learning Difficulties	X	X	X	1 (Medium)		• As above	• As above
	Learning Disabilities	X	X	X	1 (Medium)		• As above	• As above
	Mental Health	X	X	X	1 (Medium)		• As above	• As above
Sexual Orientation	Lesbian, gay men, bisexual	X	X	X	1 (Low)		• As above	• As above
Age	Older people (50+)	X	X	X	2 (Medium)		• As above	• As above
	Younger people (16 - 25)	X	X	X	1 (Low)		• As above	• As above
	Children	x	x	x	1 (Medium)		• As above	• As above
Gender Reassignment		X	X	X	1 (Low)		• As above	• As above
Impact due to pregnancy/maternity		X	X	X	1 (Medium)		• As above	• As above
Groups with particular faiths and beliefs		x	X	X	1 (Medium), Christian, Muslim		• As above	• As above
People on low incomes				X	1 (Medium)		• As above	• As above

APPENDIX C
SECTION 4: ACTION PLAN

<p>4.1</p> <p>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.</p> <p><i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i></p> <p>NB. Add any additional rows, if required.</p>								
	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG	
	Review the Policy when it has been in operation and has been implemented for one year	All	To understand how it impacts on different groups	Internal	Head of Policy	Summer 2019 (estimated)		
	Collect equalities data on affected leaseholders	All	To better evaluate the impact of the Policy on different groups	Internal	Director of Housing	Ongoing		
	Prepare further EIAs on a scheme by scheme basis (or include in EIAs on preferred options)	All	To review the equality impacts based on the specific circumstances of each scheme and more accurate data capture from the leaseholders affected	Internal	Head of Policy/Director of Housing	Variable		
	<i>Enter additional rows if required</i>							

Conclusion

The Policy provides options for resident leaseholders to remain in their neighbourhoods with housing costs similar to those they have now. The core product offered replicates current ownership as far as is possible, consistently with the council's fiduciary duties and so the overall viability of the renewal scheme is not compromised. There are additional options for those that do not qualify for the core equity loan/shared equity offer and cannot buy outright.

The Policy is an updated version of a policy completed in 2014 and the offers contained in it are more generous than under the original Policy. While the council has taken steps to mitigate the negative impacts, they will not be eradicated in full, as the core product offer to return to the housing renewal area does not replicate the outright ownership leaseholders have now.

If the council were to mitigate this impact in full or to a significantly greater extent, the Policy would require significant additional funds to be committed for long-term timeframes. This would be likely to result in the Policy not being affordable and impacting on the ability to implement housing renewal schemes in accordance with the council's overarching strategy. This would then have a detrimental impact overall, and therefore restrict the council's ability to deliver its aims of improving housing conditions, increasing the supply of affordable housing and improving neighbourhoods.

The data available for this EIA is limited. The council is in the process of collecting more relevant data in respect of its leaseholders. However, the Policy sets out general principles which may be adapted for individual housing renewal schemes. It is recommended that individualised EIAs are prepared for each housing renewal scheme so that the specific circumstances and equality impacts of each scheme can be addressed on a scheme by scheme basis. In addition, a review of the Policy should take place after it has been implemented for 12 months.

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER



SIGNATURE:

FULL NAME:Tom McGregor, Director of Housing and Regeneration.....

UNIT:Growth, Planning and Housing

EMAIL & TELEPHONE EXT: ...tmcgregor@westminster.gov.uk. 020 7641 4081.....

DATE (DD/MM/YYYY):24/08/2018.....

WHAT NEXT?

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by (insert date).

All completed EIAs should be sent to Equalities@westminster.gov.uk

