



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 Tenants in Housing Renewal Areas 2019</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 all at different stages. They are the Tollgate Gardens and Ebury Bridge Estates and the Church Street area.</p> <p>The Housing Strategy: Direction of Travel Statement 2015² 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:</p> <ul style="list-style-type: none"> • The development of new properties for social rent which can mean existing council tenants have to move. (It also involves the development of new private homes for rent and/or sale and intermediate homes for rent/and or sale) • Other tenants having to move i.e. homeless households in temporary accommodation (which can be council or private housing) or private tenants (living in council leasehold properties which are rented out).

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

² www.westminster.gov.uk/housing-strategies

A Tenant Decant Policy for Housing Renewal Areas³ was published in 2015 and accompanied by a full EIA. The Policy set out a range of options for council tenants, including an option to return to/remain in, the housing renewal area. It also set out that the new home would be of the size needed rather than the current size (so overcrowding would be resolved).

What this Equality Impact Assessment (EIA) is evaluating

This EIA evaluates the council's updated **Policy for Tenants in Housing Renewal Areas 2019**. The Policy sets out:

- The rehousing rights and options for council tenants in housing renewal areas that need to move
- The financial compensation available to them
- The general processes which will be followed
- The support offered to other tenants.

Overall, the updated Policy improves the offer to tenants compared with the current Policy. It was consulted on between November 2018 – February 2019.

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.

This EIA does not evaluate the principle of housing renewal, but the rehousing rights and options for tenants once the decision to proceed with it has been agreed. Other EIAs evaluate the impact of housing renewal itself. An EIA has been carried out on the proposed option for the Ebury Bridge Estate:

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

An EIA in relation to the housing renewal at Church Street is also being developed.

The aims of the Policy

These are to ensure:

- Council tenants that have to move have the right to remain in/return to, the housing renewal area so they can benefit from the new homes and are able to retain their local links and networks
- There are other options for council tenants that prefer to move away to suit different circumstances
- Council tenants retain the same tenancy rights when they move, as far as is possible
- Local problems such as overcrowding are addressed
- Tenants are supported to move
- There is a fair and transparent approach to rehousing.

³ www.westminster.gov.uk/sites/default/files/tenant_decant_policy_23_mar_15.pdf

Key features of the Policy

Every council tenant has the right to a new social home in the housing renewal area. They can:

1. Move straight into one of the new social homes if this is possible
2. Move into another social home in Westminster for a temporary period and then move into one of the new social homes when they are ready

Those that do not want to move into one of the new social homes can:

3. Move into another social home in Westminster

Those that are interested in becoming home owners can:

4. Have high priority for any of the new intermediate homes developed

The new social homes will generally be of the size needed, rather than the same size of the current home, so overcrowding will be resolved, but under occupiers could be offered a smaller home. The Policy sets out the household members that can be included in the assessment to work out the size of the new home and it also sets out the size of the new home. These principles generally follow the council's Allocation Scheme but there are some exceptions.

Households in temporary accommodation will be given full information about when they have to move. Those that are within twelve months of being offered social housing will be awarded additional priority in order to bring their move forward, to avoid the disruption of them having to move twice in a short period of time.

Private tenants will be visited at least once and those at risk of homelessness will be referred to the council's Homelessness Service.

The main difference between the current Policy (published in 2015) and the new Policy are:

General

- It is simpler and sets out principles rather than detailed processes

For council tenants

- The appeals policy is different, there is now a longer period in which to make an appeal, but the appeal will no longer be considered by a panel
- There is more flexibility to include older household members in the assessment to determine the size of the new home
- There is some flexibility to offer under occupiers one bedroom above their assessed need in some cases (subject to available supply)

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	<ul style="list-style-type: none"> • Social housing tenants needing to move will have the highest points in the Housing Allocation Scheme • Choice based lettings will still be used to bid for alternative homes, but this will be for a specific period, after which direct offers will be made • Where a ‘family split’ has been agreed, (where a grown up son or daughter is offered their own home, rather than moving with the tenants for example), a flexible or fixed term tenancy will be offered, in line with the council’s Tenancy Policy. <p><i>For other tenants</i></p> <ul style="list-style-type: none"> • Homeless households will be prioritised for alternative temporary accommodation in London • Private tenants will be visited at least once and will be referred to the council’s Early Intervention Trailblazer Service if they are threatened with homelessness, for as long as it is running
	<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>2</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 apply to any housing renewal area across the council, current and future.</p> <p>There are:</p> <ul style="list-style-type: none"> • 11,500 rented council homes in Westminster and potentially any council tenant could be impacted by the Policy, which is 9% of all Westminster households. • 789 temporary accommodation tenants living in council properties (including leasehold properties which are rented out) which is less than 1% of Westminster households. • An estimated 3,429 private tenants living in council leasehold properties (which are rented out privately) which is 3% of Westminster households and 6% all private tenants. <p>Currently, the following tenants are directly impacted:</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr style="background-color: #D9E1F2;"> <th></th> <th>Council</th> <th>Temporary accommodation</th> <th>Private</th> <th>Total</th> <th>% of Westminster households</th> </tr> </thead> <tbody> <tr> <td style="text-align: left;">Ebury Bridge Estate</td> <td>89*</td> <td>20</td> <td>56</td> <td>165</td> <td><1%</td> </tr> <tr> <td style="text-align: left;">Church Street area</td> <td>328</td> <td>44</td> <td>43</td> <td>415</td> <td><1%</td> </tr> </tbody> </table> <p>*Another 50 tenants have already moved away as the moving process has started</p> <p>About the data The following tables show the profile of tenants <i>potentially</i> and <i>directly</i> impacted.</p> <p><i>For those potentially impacted</i> Local data on tenants has been used where available for council and temporary accommodation tenants. Data from the council's City Survey 2017 has also been used where available. This involves a survey of a representative sample of residents from different tenures upon which assumptions can be made.</p>		Council	Temporary accommodation	Private	Total	% of Westminster households	Ebury Bridge Estate	89*	20	56	165	<1%	Church Street area	328	44	43	415	<1%
	Council	Temporary accommodation	Private	Total	% of Westminster households														
Ebury Bridge Estate	89*	20	56	165	<1%														
Church Street area	328	44	43	415	<1%														

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Information on private tenants is limited and the City Survey 2017 and the Census 2011 are the only local sources of data. However, they should be treated with caution and they only give an indicative profile of private tenants due to: the high rates of churn in the sector, Census data is now a number of years old; and it is data for *all* private tenants, not just those living in housing renewal areas, and private rented homes in housing renewal areas are often amongst some of the cheapest private rented homes locally.

For those directly impacted (At the Ebury Bridge Estate and Church Street area)

Data is from:

- 1) Local records about council and temporary accommodation tenants. Given the numbers in temporary accommodation are low, small changes will affect percentages
- 2) Housing surveys carried out to understand the needs of council tenants for rehousing. These surveys are at different stages and are complete for Ebury and 63% complete for Church Street (To note: surveys have been sent to all council tenants)
- 3) Other sources. For Church Street, Ward data from the Census 2011 has been used for private rented tenants and for the reasons outlined above, this can only give an indicative picture of their profile. Census 2011 data for private tenants at Ebury has not been used given it is at super output level which is not considered a large enough sample size.

Information for the housing renewal programme at the Tollgate Gardens Estate has not been included as this programme is nearly complete.

Gender

Table 1: Tenants potentially impacted by gender

All households	Council	Temporary Accommodation	Private	Westminster Population (all tenures)
Male	41%	29%	53%	52%
Female	59%	71%	47%	48%
Source	Local records Lead tenant/s	Local records Lead applicant	Census 2011 All private tenants	Mid-year population estimates 2017

Table 2: Tenants directly impacted by gender (Church Street)

	Tenants directly impacted		Local population	
	Council	Temporary accommodation	Private tenants	All tenures
Male	53%	18%	49%	49%
Female	47%	82%	51%	51%
Source	Housing survey Lead tenant/s	Local records Lead applicant	Census 2011, Church Street Ward. All residents not just those directly impacted	

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Table 3: Tenants directly impacted by gender (Ebury)

	Tenants directly impacted		Local population
	Council	Temporary accommodation	All tenures
Male	49%	32%	49%
Female	51%	68%	51%
Source	Housing survey Lead tenant/s	Local records Lead applicant	Census 2011 Lower super output area Ebury EIA

Disability

Table 4: Tenants potentially impacted by health and disability

HEALTH	Council	Private	All tenures	Temporary accommodation	Westminster population
Very good	23%	42%	34%		54%
Good	52%	54%	51%		30%
Fair	20%	4%	13%		10%
Bad/very bad	5%	0%	2%		6%
DISABILITY					
Day to day activities limited a lot	19%*	0%	3%		7%
Wheelchair adapted home needed				<1%	
ARE A CARER					
No	93%	99%	96%		93%
Yes	7%	1%	4%		7%
Source	*Local records for council tenants but the question is not directly comparable/Westminster City Survey 2017			Local records	Census 2011

Across Westminster, an estimated 16% of the working age population may have a common mental health issue⁴. Information on those with a specific mental health issue is not available by tenure, with the exception of temporary accommodation tenants. At July 2019 just under 5% of those currently living in temporary accommodation were accepted as homelessness due to having a mental health issue and the majority of those were single people. It is likely, however, that other temporary accommodation tenants have mental health problems. Other data support this and a national survey conducted by Shelter of 2,000 people in temporary accommodation⁵, found that more than half said that they were suffering from depression.

⁴ PANSI information 2015

⁵ http://england.shelter.org.uk/data/assets/pdf/file/0012/40116/Living_in_Limbo.pdf

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Table 5: Tenants directly impacted by disability (Church Street)

	Directly impacted			Local population	
	Council	Temporary accommodation		Private	All tenures
Disability	39%		Disability/day to day activities limited a lot	13%	12%
Wheelchair adapted home needed		3%			
Source	Housing survey Lead tenant	Local records		Census 2011 Church Street Ward. All residents, not just those directly impacted	

Table 6: Tenants directly impacted by disability (Ebury)

	Directly impacted			Local population
	Council	Temporary accommodation		All tenures
Disability	Not recorded		Disability/day to day activities limited a lot	8%
Type of property needed		14% need a level access property		
Source	Housing survey	Local records		Census 2011 Lower super output area. Ebury EIA

Sexual orientation

There is no city wide data available, but the Office of National Statistics estimate the Lesbian, Gay and Bisexual population of London to be 2.2-3% which is 5,478 – 7,470 people in Westminster.

Table 7: Tenants directly impacted by sexual orientation (Church Street)

	Council
Heterosexual	95%
Gay/Lesbian	0%
Bisexual	1%
Other	0%
Unknown/prefer not to say	4%
Source	Housing survey

Information for other tenures is not available.

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Table 8: Tenants directly impacted by sexual orientation (Ebury)

	Council
Heterosexual	93%
Gay/Lesbian	1%
Bisexual	0%
Other	1%
Unknown/prefer not to say	5%
Source	Housing survey

Information for other tenures is not available.

Race

Table 9: Tenants potentially impacted

	Council	Temporary accommodation	Private	Westminster Population
White	44%	21%	67%	60%
Black	18%	25%	3%	7%
Arab	14%	21%	8%	8%
Asian	15%	16%	14%	12%
Mixed	3%	3%	3%	5%
Other	6%	13%	4%	6%
Source	Local records Lead tenant/s	Local records Lead applicant	Census 2011	GLA Ethnic Projections for 2018 – persons

Table 10: Tenants directly impacted (Church Street)

	Directly impacted		Local population	
	Council	Temporary accommodation	Private	All tenures
White	34%	7%	44%	38%
Black	15%	23%	8%	14%
Arab	21%	30%		22%
Asian	17%	17%	16%	6%
Mixed	4%	3%	5%	14%
Other	8%	20%	27%	6%
Source	Housing survey. Doesn't include unknowns Lead tenant/s	Local records Lead applicant	Census 2011. All residents not just those directly impacted	

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Table 11: Tenants potentially impacted (Ebury)

	Directly impacted		Local population
	Council	Temporary accommodation	All tenures
White	67%	19%	59%
Black	12%	38%	11%
Arab	8%	13%	6%
Asian	6%	13%	12%
Mixed	1%	0%	6%
Other	6%	19%	6%
Source	Housing survey Tenant/s	Local records Lead applicant	Census 2011

Age

Table 12: Tenants potentially impacted by age

	Council	Temporary accommodation	Private	Westminster Population
16 - 24	1%	7%	14%	13%
25 - 44	21%	65%	70%	45%
45 - 64	46%	25%	10% (Ages 50 – 64)	27%
65 - 74	17%	2%	6%	8%
75+	15%	1%		7%
Source	Local records Lead tenants	Local records Lead applicant	Census 2011	Mid-year population estimates 2017

Table 13: Tenants directly impacted by age (Church Street)

	Directly impacted		Local population	
	Council	Temporary accommodation	Private	All tenures
16 - 24	1%	0%	18%	17%
25 - 44	20%	6%	69%	50%
45 - 64	37%	45%	9%	18%
65 - 74	18%	48%	5%	15%
75+	22%			
Source	Housing survey Lead tenant/s	Local records Lead applicant	Census 2011, Church Street Ward. Adult population. All residents, not just those directly affected	

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Table 14: Tenants directly impacted by age (Ebury)

	Directly impacted		Local Population
	Council	Temporary accommodation	All tenures
16 - 24	0%		13%
25 - 44	18%	59%	47%
45 - 64	48%	36%	27%
65 - 74	26%	5%	9%
75+	8%		5%
Source	Housing survey Lead tenant/s	Local records Lead applicant	Census 2011, Lower super output area. Ebury EIA

Pregnancy and maternity/children in household

Table 15: Tenants potentially impacted by household composition

	Council	Temporary accommodation	Private	Westminster population
CHILDREN IN HOUSEHOLD				
Yes	25%	86%	15%	19%
No	75%	14%	85%	81%
Pregnant	Not available	13%		1,990*
Source	Local records	Local records	Census 2011	*Live birth tables 2015 Census 2011

Table 16: Tenants directly impacted by household composition (Church Street)

	Directly impacted		Local population	
	Council	Temporary accommodation	Private	All tenures
CHILDREN IN HOUSEHOLD				
Yes	27%	70%	26%	32%
No	73%	30%	74%	68%
Pregnant	0.5%	12%		175*
Source	Housing survey Lead tenant/s	Local records Lead applicant	Census 2011 Church Street Ward	* Live birth tables 2015 Census 2011, Church Street Ward/

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Table 17: Tenants directly impacted by household composition (Ebury)

	Directly impacted		Local population
	Council	Temporary accommodation	All tenures
CHILDREN IN HOUSEHOLD			
Yes	27%	77%	16%
No	73%	23%	84%
Pregnant	0%	15%	
Source	Housing survey Lead tenant/s	Local records Lead applicant	Census 2011 Lower super output area Ebury EIA

Table 18: Tenants potentially impacted by religion and belief

Religion or belief

	Council tenants	Private tenants	Westminster population
Christian	45%	42%	45%
Buddhist	1%	2%	1%
Hindu	0%	2%	2%
Jewish	1%	3%	3%
Muslim	32%	17%	18%
Sikh	0%	0%	<1%
Other	1%	1%	<1%
None	12%	25%	20%
Not stated	9%	9%	9%
Source	Census 2011		

Data for temporary accommodation tenants is not available

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Table 19: Tenants directly impacted by religion and belief (Church Street)

	Directly impacted	Local population	
	Council tenants	Private tenants	All tenures
Christian	34%	30%	35%
Buddhist	0%	2%	1%
Hindu	0%	1%	1%
Jewish	1%	0%	<1%
Muslim	44%	39%	42%
Sikh	1%	0%	<1%
Other	1%	1%	<1%
None	14%	19%	11%
Source	Housing survey	Census 2011 Church Street Ward. All residents, not just those directly affected	

Table 20: Tenants directly impacted by religion and belief (Ebury)

	Directly impacted	Local population
	Council tenants	All tenures
Christian	49%	55%
Buddhist	0%	1%
Hindu	0%	1%
Jewish	1%	1%
Muslim	17%	13%
Sikh	0%	<1%
Other	5%	1%
None	11%	20%
Source	Housing survey. Doesn't include those who prefer not to say	Census 2011 Lower super output area. Ebury EIA

Economic activity

Table 21: Tenants potentially impacted by economic activity

Working age population	Council tenants %	Private tenants	All Tenures %
Full time	37%	61%	50%
Working part time/apprentices	13%	12%	10%
Not working	45%	25%	37%
Claiming workless benefits (those aged 16-64)	11%	7%	8%
Source	Westminster City Survey 2017		

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Current data indicates around 50% of households in temporary accommodation are in some form of work, including part time work.

Table 22: Tenants directly impacted by economic activity (Church Street)

	Directly impacted		Local population	
Working age population	Council tenants %	Temporary accommodation	Private tenants	All tenures
Full time	18%	24%	37%	27%
Part time	9%		14%	12%
Not working	68%			
Source	Housing survey Lead tenant/s	Local records Lead applicant	Census 2011, Church Street Ward. All residents, not just those directly affected	

Table 23: Tenants directly impacted by economic activity (Ebury)

	Directly impacted		Local population
Working age population	Council tenants %	Temporary accommodation	All tenures
Full time	Not available	50%	38%
Part time			9%
Not working		50%	34%
Source		Local records Lead applicant	Census 2011 Lower super output area

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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.

Potentially impacted tenants:

Council tenants compared with the overall Westminster population, are more likely to be:

- Women: 59% are women compared with 48% overall
- In poorer health: 5% described their health as bad compared with 3% overall. 20% described their health as 'fair', compared with 13% overall. Although the data sources are not directly comparable, council are tenants are more likely to have a disability (19%) compared to 7% overall
- From certain ethnic groups: Black (18%), Arab (14%) and Asian (15%) groups, compared with, 7%, 8% and 12% respectively overall
- Over 45: 46% are 45 – 64 compared with 27% overall. 15% are over 75 compared with 7% overall
- Households with children: 25% compared with 19% overall
- Have a Muslim faith: 32% compared with 18% overall
- Less likely to be working: 45% compared with 37% overall.

Temporary accommodation tenants compared to the overall Westminster population, are more likely to be:

- Women: 71% are women compared to 48% overall (there are likely to be more pregnant women compared with households overall)
- More likely to have a mental health issue
- From the: Black (25%), Arab (21%), Asian (16%) and Other (13%) groups compared to 7%, 8%, 12% and 6% respectively
- Households with children: 86% compared with 19% overall
- Less likely to be working full time: although the data sets are not directly comparable.

Private tenants compared to the overall Westminster population, are more likely to be: (although this is not necessarily representative of all private tenants in housing renewal areas)

- From the: White group (67%) compared with 60% overall
- Younger: 84% are 44 and under compared with 58% overall
- Singles/couples: 85% compared with 81% overall
- Have no religion: 25% compared with 20% overall
- Working full time: 61% compared with 50% overall.

Directly impacted tenants:

The following table shows local over representations compared to the Westminster population

Council tenants	
Church Street	Ebury
<p>More:</p> <ul style="list-style-type: none"> • Disabled households • Black, Arab and Asian households • In the 45 plus age group, particularly in the 75 + age group • Households with children 	<p>More:</p> <ul style="list-style-type: none"> • White and Black households • In the 45 – 74 age group • Households with children

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Temporary accommodation tenants	
Church Street	Ebury
<p>More:</p> <ul style="list-style-type: none"> • Women • Black, Arab, Asian and Other households • In the 45 – 74 age group • Households with children 	<p>More:</p> <ul style="list-style-type: none"> • Women • Black households • In the 24 – 44 and 45 – 64 age group • Households with children
Private tenants	
Church Street	Ebury
<p>More</p> <ul style="list-style-type: none"> • Disabled households • Other households • In the 16 – 24 and 25 – 44 age groups • Households with children 	<ul style="list-style-type: none"> • Not available
<p>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 may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</p>	<p><i>If yes, provide details.</i></p> <p>Overall council tenants compared with the overall Westminster population, are less likely to be:</p> <ul style="list-style-type: none"> • Men • White • In the 16 – 24 age group • Working full time. <p>Overall temporary accommodation tenants compared with the overall Westminster population, are less likely to be:</p> <ul style="list-style-type: none"> • Men • Households without children • Possibly working full time • White. <p>Overall private tenants compared with the overall Westminster population, are less likely to be:</p> <ul style="list-style-type: none"> • In poor health • Black • Older • Have children • Not working.

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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?																																																					
<p>Council tenants The impact of the Policy is positive on all council tenants as they have a right to one of the new homes in the redevelopment, of the size needed, and are able to remain in their community and retain local links and networks. Overcrowding will be addressed, which particularly benefit households with children. However, at the same time there are also negative impacts in that under occupiers (that are more likely to be older) will be offered smaller homes. The impacts on all groups are therefore positive and negative.</p> <p>Temporary accommodation tenants The impact on temporary accommodation tenants is both positive and negative. It is positive because if they are within 12 months of being offered social housing, when they need to move, they will be prioritised for alternative social housing. It is negative because they will not benefit from the new homes in the new development and they may have been living in the local area for some time.</p> <p>Private tenants The impact on private tenants is largely negative as there is no rehousing offer, although help and support will be available to those that may be homeless as a result of housing renewal.</p>																																																						
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 40%;"></th> <th style="width: 15%;">None</th> <th style="width: 15%;">Positive</th> <th style="width: 15%;">Negative</th> <th style="width: 15%;">Not sure</th> </tr> </thead> <tbody> <tr> <td>Men or women</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> <td>People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)</td> <td style="text-align: center;"><input type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input checked="" type="checkbox"/></td> <td style="text-align: center;"><input type="checkbox"/></td> </tr> <tr> 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⁶ Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

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	<p>If any of the answers to the questions above is, “negative” or “unclear” you will need to undertake a detailed impact assessment.</p>
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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?
	As there are potentially both positive <i>and</i> negative impacts. As set out further in Section 3, the design of the final Policy seeks to help mitigate these negative consequences.

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SECTION 3: ASSESSING THE IMPACT

This EIA assesses different aspects of the Policy:

- 3A General approach to rehousing and support and information (council tenants)
- 3B The size of the new home offered (council tenants)
- 3C The general offer and support to other tenants

3A: General approach to rehousing and support and information (Council tenants)

Positive impacts

1. Tenants have the right to remain in or return to the housing renewal area and to remain in their community. This will particularly benefit families with local support and children at local schools and those with local support networks. Affected tenants will have the highest priority to move in the Allocation Scheme
2. Every tenant has access to independent advice to discuss their options and this will be done in a way suited to their needs which will benefit vulnerable people
3. Tenants are compensated for having to move at a time not of choosing and have support to move. The council arranges services relating to moving, so low income households will not have to pay for these up front. Additional support is available for those that may need help with packing etc. which will benefit those that are vulnerable and older tenants for example
4. The Policy will be communicated in an accessible way and everyone will have a named contacts in the Relocations Team

Negative impacts

1. There is no right of return for older tenants in community supportive housing (sheltered) if it is not being replaced in the housing renewal area
2. There is no right of return to exactly the same area of an estate where someone had been living, this may impact people with very local networks, for example those giving or receiving care and support. This could impact women disproportionately that are more likely to be carers. Any temporary housing may not be in the same area as where people have been living due to limited supply, although there is a criteria in the Policy to prioritise those with the highest needs for local accommodation
3. When the Policy was consulted on, there were questions from tenants about timing and detail not included in the Policy (around disturbance payments for example). This might particularly impact on vulnerable tenants
4. Tenants will generally bid for the new homes using choice based lettings. Some, that have not moved for a long time, may be unfamiliar with this and could find it hard to use. This could have a greater impact on older and vulnerable tenants
5. While the rents in the new homes will be set in line with national guidance, they could be higher than current rents and service charges could be higher. This might particularly impact those with low incomes that are not receiving benefits

*Any negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population (these impacts are not identified in the table below). 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 tenants. 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 tenants

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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				
3A General approach to rehousing and support and information (Council tenants)							
Gender	Men	X	X	x			
	Women	X	X	x	Medium (2 - 5)		<ul style="list-style-type: none"> Households can bid for alternative temporary accommodation, so have choice over their location With the highest priority to move, tenants will have top priority for local supply, which will help to enable them to remain locally Support to use choice based lettings will be available, and direct offers will be made concurrently One local move will be offered where possible (this is the aim at Church Street) Full information about moving, not covered in the Policy, will be available as needed
Race	White	X	X	x			

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	Mixed/Multiple ethnic groups	X	X	x			
	Asian/Asian British	X	X	x	Medium (2 - 5)		<ul style="list-style-type: none"> As above
	Arab	x	x	x	Medium (2 - 5)		<ul style="list-style-type: none"> As above
	Black/African/Caribbean/Black British	X	X	x	Medium (2- 5)		<ul style="list-style-type: none"> As above
	Gypsies / travellers	N/A	N/A				
	Other ethnic group	X	X	x	Medium (2- 5)		<ul style="list-style-type: none"> As above
Disability	Physical	X	X	x	Medium (2 - 5)		<ul style="list-style-type: none"> As above, extra support for bidding/moving etc will be available as needed
	Sensory	X	X	x	Medium (2 - 5)		<ul style="list-style-type: none"> As above, extra support for bidding/moving etc will be available as needed
	Learning Difficulties	X	X	x	Medium (2 - 5)		<ul style="list-style-type: none"> As above, extra support for bidding/moving etc will be available as needed
	Learning Disabilities	X	X	x	Medium (2- 5)		<ul style="list-style-type: none"> As above, extra support for bidding/moving etc will be available as needed

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	Mental Health	X	X	x	Medium (2- 5)		<ul style="list-style-type: none"> As above, extra support for bidding/moving etc will be available as needed 	
Sexual Orientation	Lesbian, gay men, bisexual	X	X	x				
Age	Older people (50+)	X	X	x	High (1)		<ul style="list-style-type: none"> The Policy has been adjusted so older tenants in community supportive housing will have a right of return/remain 	
	Younger people (16 - 25)	X	X	x				
	Children	x	x	x	Medium (2)		<ul style="list-style-type: none"> As above 	
Gender Reassignment		X	X	x				
Impact due to pregnancy/maternity		X	X	x				
Groups with particular faiths and beliefs		x	X	x	Medium (2)		<ul style="list-style-type: none"> As above 	
People on low incomes		x	x	x	Medium (2)		<ul style="list-style-type: none"> As above 	

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3B: The size of the new home (council tenants)

Positive impacts

1. Overcrowded households will be offered homes to meet their needs. This is more likely to impact on larger households and households with children
2. Grown up household members, (adult children of tenants for example) could be offered their own home (known as family splits). This is more likely to benefit young people
3. The Policy takes into account if a carer is needed

Negative impacts

1. Under occupiers will be offered smaller homes compared to their current ones. This is more likely to impact on older tenants
2. The assessment to calculate the size of new home is based around only original household members being included (unless household members have had children). This means that some new, but nevertheless long standing members of household, may be excluded from the assessment to determine bedroom size. (Note the draft Policy which was consulted on includes more flexibility in this area, if this household member is older and they did not cause overcrowding when they moved in)
3. Single people, that are living in one bedroom homes, could be offered studio properties. Although there will not be any studios in the new developments, this could affect those that have chosen to move away. This could disproportionately affect single people and possibly those with mental health problems as they are more likely to be living in one bedroom homes.

*Any negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population (these impacts are not identified in the table below). 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 tenants. 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 tenants

APPENDIX C

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				
3B: The size of the new home (council tenants)							
Gender	Men	X	X	x			
	Women	X	X	x	Medium (1 – 3)		<ul style="list-style-type: none"> The Policy has been adjusted to include a discretion for under occupiers to be offered one bedroom above their assessed needs, for their permanent move p- The Policy has been adjusted so single people living in one beds will not be offered studios There is flexibility within the Policy to deal with exceptional circumstances with regards to size of the new home
Race	White	X	X	x			

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	Mixed/Multiple ethnic groups	X	X	x			• As above	
	Asian/Asian British	X	X	x	Medium (1 – 3)		• As above	
	Arab	x	x	x			• As above	
	Black/African/Caribbean/ Black British	X	X	x	Medium (1 – 3)		• As above	
	Gypsies / travellers	N/A	N/A					
	Other ethnic group	X	X	x	Medium (1 – 3)		• As above	
Disability	Physical	X	X	x	Medium (1 – 3)		• As above	
	Sensory	X	X	x	Medium (1 – 3)		• As above	
	Learning Difficulties	X	X	x	Medium (1 – 3)		• As above	
	Learning Disabilities	X	X	x	Medium (1 – 3)		• As above	
	Mental Health	X	X	x	Medium (1 – 2) High (3)		• As above	

APPENDIX C

Sexual Orientation	Lesbian, gay men, bisexual	X	X	x			•	
Age	Older people (50+)	X	X	x	High (1) Medium (2 – 3)		• As above	
	Younger people (16 - 25)	X	X	x				
	Children	X	X	X				
Gender Reassignment		X	X					
Impact due to pregnancy/maternity		X	X	x				
Groups with particular faiths and beliefs		x	X	x	Medium (1 – 3)		• As above	
People on low incomes		x	x	x	Medium (1 – 3)		• As above	

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Section 3C: The general offer and support to other tenants

Positive impacts

Temporary Accommodation tenants

1. Households within 12 months of being offered social housing will be awarded extra priority to help them move more quickly – so they don't have to move again.
2. Where the above doesn't apply and temporary accommodation households do need to move due to housing renewal, they will be prioritised for alternative accommodation in Westminster/adjoining boroughs if they meet a criteria or in London. (Currently they could be offered alternative temporary accommodation outside London).

Private tenants

3. Anyone threatened with homelessness will be visited at least once and referred to the council's Early Intervention Trailblazer Service, for as long as it is running, which provides support and which can include help to find alternative private rented housing.

Negative impacts

Temporary Accommodation tenants

1. Temporary accommodation tenants will not be offered newly developed social homes in the housing renewal area. A number of respondents to the consultation were frustrated by this and the nature of the tenure generally. This will mostly impact those groups that are over represented in temporary accommodation, compared to their population share (see Section 2).

Private tenants

2. Private tenants will have to move and will not benefit from any of the newly developed social homes in the housing renewal area. Private rented homes at Church Street are amongst some of the cheapest in Westminster and this could result in private tenants having to move away, if alternative private rented housing is not available. This will most impact those groups that are over represented amongst private tenants (see Section 2).

*Any negative impact is assessed as **low**, if the impact would have no greater impact on the group than it would on the overall population (these impacts are not identified in the table below). 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 tenants. 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 tenants

APPENDIX C

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				
3C: The general offer and support to other tenants								
Gender	Men	X	X				No further mitigations can be made	
	Women	X	X		Medium (1)			
Race	White	X	X		Medium (2)			
	Mixed/Multiple ethnic groups	X	X					
	Asian/Asian British	X	X					
	Arab	x	x		Medium (1)			
	Black/African/Caribbean/Black British	X	X		Medium (1)			
	Gypsies / travellers	N/A	N/A					
	Other ethnic group	X	X		Medium (1)			
Disability	Physical	X	X		Medium (1)			
	Sensory	X	X		Medium (1)			
	Learning Difficulties	X	X		Medium (1)			
	Learning Disabilities	X	X		Medium (1)			

APPENDIX C

	Mental Health	X	X		Medium (1)		
Sexual Orientation	Lesbian, gay men, bisexual	X	X				
Age	Older people (50+)	X	X				
	Younger people (16 - 25)	X	X		Medium (2)		
	Children	x	x		Medium (1)		
Gender Reassignment		X	X				
Impact due to pregnancy/maternity		X	X		Medium (1)		
Groups with particular faiths and beliefs		x	X				
People on low incomes					Medium (1)		

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SECTION 4: ACTION PLAN

4.1	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. <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> NB. Add any additional rows, if required.						
	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Ensure all relevant information about moving is available	All	Full information is available and communicated in line with needs	None	Project leads for Church Street and Ebury		
	The Policy is reviewed periodically	All	Learning from implementing the Policy is incorporated into it	None	Principal Policy Officer		
	<i>Enter additional rows if required</i>						

Conclusion

Some negative impacts have been identified and the mitigations outlined in this EIA will help to address them. Some adjustments have been made to the Policy to mitigate the most significant negative impacts on households with protected characteristics. These are:

- Older council tenants in community supportive housing will now have a right to a new community supportive home in the housing renewal area
- There is now a discretion for council tenants that are under occupying to have one bedroom above their assessed need for their permanent move as long as there is supply
- Single council tenants, that are more likely to have mental health issues, living in one bedroom homes will not be offered studios.

There are still some negative impacts however which cannot be fully mitigated:

Size of the new home (council tenants)

Despite the adjustment relating to the size of the new council home for under occupiers, it could still be smaller than the one currently occupied, although this needs to be balanced with the replacement home being brand new and that the Policy is also addressing overcrowding. The option of a 'like for like' offer for under occupiers has been considered, but the council needs to also take into account the needs of all those on its waiting list of social housing (currently nearly 4,000 households, including 2,700 homeless households in temporary accommodation), many of whom have protected characteristics.

Local of the new/temporary home (council tenants)

The right to return is not to exactly the same location or block in housing renewal areas, so some very local support networks could be disrupted. The Policy may also result in some households, that have opted to return, having to temporarily move away until the new homes are ready, due to the shortage of local supply which again could impact on local networks. These impacts have been considered, although there is a criteria to prioritise those with the highest support needs for local temporary housing, they cannot be fully mitigated and local supply for temporary housing will be limited.

Other tenants

Both temporary accommodation and private tenants may have to move away from local area in which they may have been living for some time. They may have local support networks and children at local schools. Offering them new affordable housing in housing renewal areas would however disadvantage other households that had been waiting longer for it or with a greater need for it. Temporary accommodation is an insecure tenure and it is not uncommon for households to move a number of times as contracts end.

Although all the negative impacts cannot be fully mitigated the Policy is considered justified and overall it helps to meet the legitimate aim of increasing affordable housing for those in need through housing renewal.

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER



SIGNATURE:

FULL NAME: Neil Wightman

UNIT: Director of Housing Services

EMAIL & TELEPHONE EXT: nwightman@westminster.gov.uk

DATE (DD/MM/YYYY): 27/08/2019

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