

## EQUALITY IMPACT ASSESSMENT TEMPLATE

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Completing an EQIA 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. EQIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EQIAs must be undertaken when it is possible for the findings to inform the final decision.

### SECTION 1:

Title	Housing Compensation Policy
<p>What are you analysing?</p> <ul style="list-style-type: none"> <li>• What is the policy/project/activity/strategy looking to achieve?</li> <li>• Who is it intended to benefit? Are any specific groups targeted by this decision?</li> <li>• What results are intended?</li> </ul>	<p><b>This equalities impact assessment aims to set out the equalities impact of a new Housing Compensation policy to be launched in Q3 2023. The assessment will assess the impact of the policy against protected characteristics.</b></p> <p><b>The policy will outline the housing service compensation framework and how compensation payments are calculated. The policy aims to achieve an approach which is:</b></p> <ul style="list-style-type: none"> <li>• Reasonable, fair and treats all residents equitably</li> <li>• Where financial awards are in proportion with the loss and/or inconvenience caused, and rates are offered within clear guidelines.</li> </ul> <p><b>The policy is intended to all benefit Westminster City Council tenants and leaseholders. In particular the compensation assessment will provide the opportunity for awards to be assessed on individual resident needs and circumstances on a case-by-case basis, taking any vulnerabilities such physical and or mental health and other protected characteristics into consideration</b></p> <p><b>The two aspects of the policy and its development are to be considered:</b></p> <ol style="list-style-type: none"> <li><b>1. Whether the resident consultation process will disproportionately impact on any group of tenants and leaseholders that share protected characteristic/s.</b></li> </ol>

	<b>2. How the policies framework will impact tenants and leaseholders in terms of when compensation is offered and how compensation is calculated.</b>
Details of the lead person completing the screening/EQIA	<b>Chantell James</b>
Date sent to <a href="mailto:equalities@westminster.gov.uk">equalities@westminster.gov.uk</a>	10 August 2023
Version number and date of update	v.1
<i>You will need to update your EQIA as you move through the decision-making process. Record the version number here and the date you updated the EQIA. 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. 1</i>	

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

Not all proposals will require a full EQIA, 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.

<p><b>2.1</b></p>	<p><b>Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal</b></p> <ul style="list-style-type: none"> <li><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></li> <li><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></li> </ul>	
	<p>How many people use the service currently? What is this as a % of Westminster's population?</p>	<p><b>WCC Housing Data:</b></p> <ul style="list-style-type: none"> <li>- There are currently 20,262 Westminster Housing tenants and 9,287 Westminster leaseholders.</li> </ul> <p><b>Westminster population data:</b></p> <ul style="list-style-type: none"> <li>- The population on Westminster is 205,087</li> </ul>
	<p>Gender</p>	<p><b>WCC Housing Data</b></p> <ul style="list-style-type: none"> <li>- 51% female tenants and leaseholders and 44% Male tenants and leaseholders</li> <li>- 5% unknown</li> </ul> <p><b>Westminster Population data</b></p> <ul style="list-style-type: none"> <li>- 51% Females</li> <li>- 49% Males</li> </ul>
	<p>Race</p>	<p><b>Westminster Housing Data</b></p> <ul style="list-style-type: none"> <li>• UNKNOWN 14,600 , 49%</li> <li>• Arab, 1,453 , 5%</li> <li>• Asian any other background, 630, 2%</li> <li>• Asian Bangladeshi, 932 , 3%</li> <li>• Asian Indian, 189 , 1%</li> <li>• Asian Pakistani, 109 , 0%</li> </ul>

		<ul style="list-style-type: none"> <li>• Black African, 1,177 , 4%</li> <li>• Black any other background, 360 , 1%</li> <li>• Black Caribbean, 678 , 2%</li> <li>• Chinese, 211 , 1%</li> <li>• Gypsy/Romany/Irish Traveller, 3 , 0%</li> <li>• Mixed any other background, 152 , 1%</li> <li>• Mixed White and Asian, 54 , 0%</li> <li>• Mixed White and Black African, 90 , 0%</li> <li>• Mixed White and Black Caribbean, 98 , 0%</li> <li>• Not Willing to Classify, 853 , 3%</li> <li>• Other Ethnic Group, 969 , 3%</li> <li>• White British, 4,437 , 15%</li> <li>• White European, 1,408 , 5%</li> <li>• White Irish, 567 , 2%</li> <li>• White Other, 579 , 2%</li> </ul> <p><b>Westminster Population data</b></p> <p>55% of the population is White British, following the top 5 non-UK nationalities 1. USA 2. Italy 3. France 4. India 5. Spain</p> <p>Top 5 non uk languages 1. Arabic 2. French 3. Spanish 4. Italian 5. Portuguese</p> <p>According to the latest 2021 census, the population in Westminster is predominantly white (55.2%), with non-white minorities representing the remaining 44.8% of the population.</p> <p>Asian ethnic groups were the largest minority group in Westminster accounting for 16.8% of the population.</p> <p>16,456 or 8% of the Westminster population identify from black ethnic groups according to the latest 2021 census.</p>
	Disability	WCC Housing data

	Sexual orientation	<b>Westminster Housing Data</b>  <b>UNKNOWN?, 25,613 , 87%</b> <b>Gay Man, 31 , 0%</b> <b>Gay Woman/Lesbian, 6 , 0%</b> <b>Heterosexual/Straight, 3,362 , 11%</b> <b>Other, 537 , 2%</b>
	Age	<b>Westminster Housing data</b> <b>UNKNOWN ?, 9,816 , 33%</b> <b>0 to 4, 141 , 0%</b> <b>10 to 14, 260 , 1%</b> <b>15 to 19, 248 , 1%</b> <b>20 to 24, 326 , 1%</b> <b>25 to 29, 449 , 2%</b> <b>30 to 34, 793 , 3%</b> <b>35 to 39, 1,107 , 4%</b> <b>40 to 44, 1,409 , 5%</b> <b>45 to 49, 1,660 , 6%</b> <b>5 to 9, 344 , 1%</b> <b>50 to 54, 1,962 , 7%</b> <b>55 to 59, 2,117 , 7%</b> <b>60 to 64, 1,768 , 6%</b> <b>65 to 69, 1,449 , 5%</b> <b>70 to 74, 1,219 , 4%</b> <b>75 to 79, 1,131 , 4%</b> <b>80 to 84, 883 , 3%</b> <b>85 to 89, 885 , 3%</b> <b>90+, 1,582 , 5%</b>
	Religion or belief	<b>Westminster Housing data</b>  <b>UNKNOWN ?, 26,598 , 90%</b> <b>Buddhism, 18 , 0%</b> <b>Christianity, 1,405 , 5%</b> <b>Hinduism, 16 , 0%</b> <b>Humanism, 2 , 0%</b> <b>Islam, 1,015 , 3%</b> <b>Judaism, 20 , 0%</b> <b>No religion or belief, 197 , 1%</b> <b>Other religion or belief, 274 , 1%</b> <b>Sikhism, 2 , 0%</b> <b>Zorostrianism, 2 , 0%</b>

<p><b>2.2</b> Are there any groups with protected characteristic that are overrepresented in the monitoring information relative to their size of the population? <i>If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service.</i></p>	<p>No</p>				
<p><b>2.3</b> Are there any groups with protected characteristics that are underrepresented in the monitoring information relative to their size of the population? <i>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.</i></p>	<p>No, according to the 2021 census 55% residents identify as white British. Asian groups were the largest minority group in Westminster accounting for 16.8% of the population. 16,456 or 8% of the Westminster population identify from black ethnic groups according to the latest 2021 census.</p> <p>The recorded data held in the Housing department represents similarities to the entire population within Westminster but on a much smaller scale relative to the number of tenants and leaseholders. - see the above data breakdowns.</p>				
<p><b>2.4</b> 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>					
		<p><b>None</b></p>	<p><b>Positive</b></p>	<p><b>Negative</b></p>	<p><b>Not sure</b></p>
	<p>Men or women</p>	<p><b>X</b></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>	<p><input type="checkbox"/></p>
	<p>People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)</p>		<p><input type="checkbox"/></p>	<p><b>X</b><input type="checkbox"/></p>	<p><b>x</b><input type="checkbox"/></p>
	<p>Disabled<sup>1</sup> people (consider different types of physical, learning or mental disabilities)</p>		<p><input type="checkbox"/> <b>X</b> <input type="checkbox"/></p>	<p><b>X</b><input type="checkbox"/></p>	<p><input type="checkbox"/></p>

<sup>1</sup> Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

People of particular sexual orientation/s	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
People in particular age groups (consider in particular children, under 21s and over 65s)		<input type="checkbox"/>	<b>x</b> <input 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	<b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Impact due to pregnancy/ maternity	<b>x</b>	<input type="checkbox"/> <b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>
People of faiths and beliefs	<b>x</b>	<input type="checkbox"/>	<input type="checkbox"/>	<b>x</b> <input type="checkbox"/>
People on low incomes		<input type="checkbox"/> <b>X</b>	<input type="checkbox"/>	<input type="checkbox"/>
<p><b>If any of the answers to the questions above is, “negative” or “unclear” you will need to undertake a detailed impact assessment.</b></p>				

2.5	Based on your responses, should a full, detailed EQIA be carried out on the project, policy or proposal?
	Yes
2.6	Provide brief reasons on how you have come to this decision?
	<p><b>The policy and communications of the resident engagement will be published in English and therefore would impact tenants and leaseholders who do not speak English</b></p> <p><b>The survey will be online and may therefor disadvantage residents who are digitally excluded for example older residents may be more at risk of this.</b></p> <p><b>Residents with certain learning disabilities maybe disadvantaged when understanding how to make a claim for compensation</b></p>



### 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.

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				
<b>Gender</b>	Men					x		
	Women					x		
<b>Race</b>	White					x		
	Mixed/Multiple ethnic groups				x		<p>To ensure we have a representative example of feedback from our residents on the draft policy we will also engage with our resident panels. These panel groups have a diverse range of voices representing the varied demographic groups of our residents.</p> <p>All residents will also be able to request documents to be translated should this be required.</p>	

	Asian/Asian British				X		See above	
	Black/African/Caribbean/ Black British				X		See above	
	Gypsies / travellers					X		
	Other ethnic group				X		See above	
<b>Disability</b>	Physical		X		X		<p>Staff will assist residents in person who may require support with completing the online survey. This will be promoted via various communication channels</p> <p>In addition, when the policy is implemented, staff will be able to support residents who may need support with making a compensation claim ie completing forms etc</p> <p>In addition, the policy will ensure residents are compensated for any impact from a service failure which impacts a resident's vulnerability negatively. An assessment of a compensation award we will actively ask residents if there are any vulnerabilities and if these have been exacerbated as</p>	

							<b>a result of the service failure.</b>	
	Sensory		X		X		See above	
	Learning Difficulties		X		X		See above	
	Learning Disabilities		X		X		See above	
	Mental Health		X		X		See above	

Protected Group		Positive impact?			Negative impact?	No specific impact	What will the impact be? If the impact is negative, how can it be mitigated? (action)	What are the cumulative of effects
		Eliminate discrimination	Advance equality	Good relations				
<b>Sexual Orientation</b>	Lesbian, gay men, bisexual					X		
<b>Age</b>	Older people (50+)				X		<p>There is a risk that some older residents will be digitally excluded and not able to complete an online survey as part of the resident's consultation process.</p> <p>In person support is being offered as part of the consultation exercise for residents who require support to complete an online form</p>	
	Younger people (16 - 25)					X		
<b>Gender Reassignment</b>						X		

Impact due to pregnancy/maternity			x				
Groups with particular faiths and beliefs					x		
People on low incomes		x				<p>The policy seeks to ensure residents are not financially disadvantaged due to service failures. As part of the assessment of a compensation award we will actively ask residents how they have been impacted including any financial impacts</p>	

## 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.

*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.*

**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
<p>Translations maybe requested for the resident consultation and policy document and assistance with completing compensation claim forms.</p> <p>Resident panels will be targeted for consultation they represent the diversity within the tenants and leaseholders within our housing stock</p>	Race	<p>To ensure the process for consultation and accessing the policy document is not a barrier for residents who do not speak English</p> <p>To capture feedback from a diverse group of residents to reflect the demographic characteristics of WCC tenants and leaseholders</p>	<p>Translation service</p> <p>Coordination with housing resident panels</p>	<p>Cherilene Thomas Housing Complaints Team <a href="mailto:Cthomas@westminster.gov.uk">Cthomas@westminster.gov.uk</a></p> <p>Henry Roffery Housing Resident Engagement Team <a href="mailto:Hroffery@westminster.gov.uk">Hroffery@westminster.gov.uk</a> 0800 358 3783</p>	<p>Ongoing</p> <p>Throughout consultation period</p>	Green
<p>Residents can call Housing Resident Engagement team if assistance is needed to complete an online survey.</p> <p>In addition, support to help residents claim</p>	Disability	To ensure residents with any disabilities are not disadvantaged in the consultation process and accessing and understanding the policy document.	Housing resident engagement team	<p>Housing Resident Engagement Team <a href="mailto:Hroffery@westminster.gov.uk">Hroffery@westminster.gov.uk</a> 0800 358 3783</p>	Throughout consultation period	Green

	<p>compensation with help on completing forms or providing alternative formats if required ie braille and assistance with completing compensation claims</p> <p>Updates to Housing WCC pages</p>		<p>WCC Webpages – clear, concise info on how to make a claim for compensation.</p>	<p>Housing Complaints team</p> <p>Housing Complaints and Housing comms team</p>	<p>Jayson Sandiford Housing Complaints Team</p> <p>Jayson Sandiford Housing Complaints team</p>	<p>Ongoing</p> <p>On the implementation of policy Dec / Jan 24</p>	
	<p>Residents can call Housing Resident Engagement team if assistance is needed to complete an online survey</p>	<p>Age</p>	<p>To ensure age is not a barrier in particular older residents who maybe a higher risk to being digitally excluded – Residents can request help to complete online surveys</p>	<p>Housing resident engagement team</p> <p>Jayson Sandiford Housing Complaints Team</p>	<p>Henry Roffery Housing Resident Engagement Team <a href="mailto:Hroffery@westminster.gov.uk">Hroffery@westminster.gov.uk</a> 0800 358 3783</p>	<p>Throughout consultation period</p>	<p>Green</p>

**THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER**

**SIGNATURE:**

**FULL NAME:** Jayson Sandiford

**UNIT:** Complaints and Service improvement Housing

**EMAIL & TELEPHONE EXT:** jsandiford@westminster.gov.uk

**DATE (DD/MM/YYYY):** 10 August 2023

**WHAT NEXT?**

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

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

**All completed EQIAs should be sent to [equalities@westminster.gov.uk](mailto:equalities@westminster.gov.uk)**