

**Appendix D – Equality Impact Assessment**

**Table 1**

<b>Author</b>	<b>Jack Skelly</b>	<b>Directorate</b>	<b>Housing</b>													
<b>Date</b>	<b>29/10/20</b>	<b>Service</b>	<b>Housing</b>													
<p><b>1. The project or decision that this assessment is being undertaken for</b></p> <p><b>Allocations policy review 2020</b></p> <p>As per the Housing Act 1996, every local authority in England must have an Allocations Policy to determine prioritisation and procedure for allocating housing accommodation.</p> <p>The Policy is a way of distributing a small number of homes as fairly as possible, while using the resources available to us as efficiently as possible, retaining flexibility to respond to fluctuations in demand from different client groups, preventing homelessness and offering choice to applicants where we can.</p> <p>We are in the process of reviewing the Policy. The Council is legally required to consult on policy changes and so, before ratifying the proposed changes, a consultation process will need to be completed.</p> <p>This policy underpins the service’s work under Housing and Homelessness strategies.</p>																
<p><b>2. The protected characteristics or other equalities factors potentially impacted by this decision</b></p> <table border="1"> <tr> <td><input checked="" type="checkbox"/> Age</td> <td><input checked="" type="checkbox"/> Race</td> <td><input checked="" type="checkbox"/> Maternity and pregnancy</td> <td><input checked="" type="checkbox"/> Marriage and civil partnership</td> <td rowspan="3"><input type="checkbox"/> Other, please define:</td> </tr> <tr> <td><input checked="" type="checkbox"/> Gender</td> <td><input checked="" type="checkbox"/> Gender reassignment</td> <td><input checked="" type="checkbox"/> Disability</td> <td></td> </tr> <tr> <td><input checked="" type="checkbox"/> Religion or belief</td> <td><input checked="" type="checkbox"/> Carer status</td> <td><input checked="" type="checkbox"/> Sexual orientation</td> <td></td> </tr> </table>				<input checked="" type="checkbox"/> Age	<input checked="" type="checkbox"/> Race	<input checked="" type="checkbox"/> Maternity and pregnancy	<input checked="" type="checkbox"/> Marriage and civil partnership	<input type="checkbox"/> Other, please define:	<input checked="" type="checkbox"/> Gender	<input checked="" type="checkbox"/> Gender reassignment	<input checked="" type="checkbox"/> Disability		<input checked="" type="checkbox"/> Religion or belief	<input checked="" type="checkbox"/> Carer status	<input checked="" type="checkbox"/> Sexual orientation	
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<p>The Allocations Policy denotes the way social housing is allocated to residents on the social housing register. There are currently over 9,000 households on the register and so there is a potential impact on all of the protected characteristics and other equalities factors outlined above.</p> <p>The current policy organises those on the social housing register into rehousing reason groups. These groups are then allocated one of three Band Priorities. The Band Priority determines how long an applicant to the register is likely to wait before successfully bidding for a property.</p> <p>Officials propose amendments to the band priorities, introducing new rehousing reason groups and moving some groups from one band to another, and introducing a new band. This is likely to impact the length of time some applicants will be on the housing register before successfully bidding for a property.</p> <p>In particular, we believe the proposed amendments protected characteristics and other equalities factors, we believe there could be a particular impact on:</p> <ul style="list-style-type: none"> <li>- Age;</li> <li>- Religion;</li> <li>- Ethnicity;</li> <li>- Disability;</li> <li>- Gender; and</li> <li>- Household type.</li> </ul> <p>Full details of the anticipated impacts and mitigations are found in the “impact summary” table below.</p>																
<p><b>3. The evidence to support the analysis</b></p> <p>The key data needed for this assessment is the service-user profile – i.e. those applying for social housing. Much of this information is provided as part of a housing application and can be sourced from the in-house system. That said, the council has limited data on the protected characteristics of applicants – applicants are not required to enter data on protected characteristics. Therefore we are unable to provide a detailed assessment of the impact of re-allocating groups, or forecast the impact with a significant degree of confidence. It should be noted that the</p>																

housing service is currently implementing a new integrated housing system. In time, and with a re-registration process proposed as part of the policy review, our data quality should improve over time.

Analysis has been undertaken into the profile of applicants from the below sources:

- Those who are on the Housing Register as at September 2020;
- Homelessness applications from April 2018 – August 2020 to establish the impacts of suggested banding changes to homeless applicants on the housing register; and
- Segments of data on clients already housed within our own stock to establish impacts of policy changes on this cohort.

Where key data is not available this will be clearly stated alongside the action that will be taken to minimise any potential negative impact.

- **The analysis**

#### Age

Housing register Age band	Count
18-25	5%
26-35	22%
36-40	16%
41-50	27%
51-60	18%
61+	12%
<b>Grand Total</b>	<b>100.00%</b>

Homelessness applications Age Range	Count
Less than 18	0.8%
18-25	21.4%
26-35	27.9%
36-40	12.5%
41-50	19.4%
51-60	12.4%
More than 60	5.5%
<b>Grand Total</b>	<b>100.00%</b>

- The most represented age bracket in the social housing register is 41-50
- The most represented age bracket in homelessness applications is 26-35
- The number of homelessness applications from young people aged 18-25 is significantly higher than the prevalence of this group on the housing register

#### Ethnicity

Housing register Ethnicity	Count
(blank)	70.3%
English/Welsh/Scottish/Northern Irish/British	8.0%
African	6.0%
Caribbean	5.6%
Not disclosed	2.2%
Any other White background	2.0%
Any other Black/ African/ Caribbean background	1.2%
Any other ethnic group	1.2%
White and Black Caribbean	0.8%
Any other Asian background	0.8%
Any other mixed/ multiple ethnic background	0.5%
Chinese	0.4%
Irish	0.3%
White and Black African	0.2%
Indian	0.2%
Bangladeshi	0.2%
Pakistani	0.2%
White and Asian	0.1%

Arab	0.0%
<b>Grand Total</b>	<b>100.00%</b>

<b>Homelessness applications Ethnicity</b>	<b>Count</b>
13 BLACK AFRICAN	23.50%
12 BLACK CARIBBEAN	23.34%
01 WHITE BRITISH	20.82%
16 OTHER ETHNICITY	6.62%
17 REFUSED	6.04%
03 WHITE OTHER	6.01%
04 WHITE & CARIBBEAN	4.31%
14 BLACK OTHER	2.48%
06 WHITE & ASIAN	2.27%
20 OTHER MIXED	1.15%
08 INDIAN	0.74%
19 ARAB	0.70%
05 WHITE & AFRICAN	0.64%
15 CHINESE	0.53%
09 PAKISTANI	0.40%
10 BANGLADESHI	0.30%
02 WHITE IRISH	0.08%
18 GYPSY/IRISH TRAVE	0.05%
11 OTHER ASIAN	0.02%
<b>Grand Total</b>	<b>100.00%</b>

- The data regarding the ethnicity of applicants on the general housing register is limited, with more than 70% of those not disclosing their ethnicity. Most applications to the general housing register are made online so a large number of applicants are choosing not to disclose this data
- We do, however, hold high quality data about the ethnicity of residents who make an application of homelessness, as this is collected by officers from the applicants. This is shown in the second table above
- This shows that over half of homeless households from the past year have been from BME households

<b>Ethnicity (Lewisham Homes tenants)</b>	<b>Proportionally over-represented in overcrowded cohort</b>
13 BLACK AFRICAN	17.40%
16 OTHER ETHNICITY	2.00%
17 REFUSED	2.00%
07 WHITE & OTHER	0.50%
20 OTHER MIXED	0.50%
05 WHITE & AFRICAN	0.40%
10 BANGLADESHI	0.20%
04 WHITE & CARIBBEAN	0.10%
06 WHITE & ASIAN	0.10%
09 PAKISTANI	0.00%
08 INDIAN	-0.10%
19 ARAB	-0.10%
02 WHITE IRISH	-0.20%
03 WHITE OTHER	-0.20%
14 BLACK OTHER	-0.50%

15 CHINESE	-0.50%
11 OTHER ASIAN	-0.60%
12 BLACK CARIBBEAN	-8.50%
01 WHITE BRITISH	-12.70%

- The above table is an assessment of overcrowded households within our own stock (Lewisham Homes) compared to the total number of households in that cohort. The percentages demonstrate whether particular ethnicities are over or underrepresented in the overcrowded cohort.
- The numbers show that people of Black African origin are disproportionately represented in the overcrowded cohort.

### Maternity

A small number of applicants on the housing register (less than 2%) are listed as pregnant.

### Language spoken

We do not have data on language spoken in the data extract; however Lewisham's Joint Strategic Needs Assessment 2019 suggests that there are over 170 languages spoken in Lewisham. Communications on policy changes will need to be sensitive to people's language needs, as will our working processes and customer service delivery.

### Gender

- Almost a quarter of applicants on the housing register are female. This is most likely because there are more single women with dependent children accepted onto the register (as dependent children is indicative of a priority need).
- 57.8% of homeless applicants in the extract analysed were female.

### Gender identity

- 1.48% of applicants on the housing register have identified as transgender
- There is no data for gender identity within homeless applicants.

### Disability

- Over 16% of applicants on the housing register have declared a disability.
- As at August 2020, there were 149 households on the housing register awaiting accessible social housing. 109 of these households were already in social housing not currently suitable for their needs. At least 15 were in temporary accommodation.
- Less than 1% of homelessness applicants in the extract declared a disability; however this relates to lead applicant only.

### Household type

Minimum bedroom need	Count
0	0.24%
1	17.00%
2	38.73%
3	33.83%
4	7.75%
5	1.88%
6	0.40%
7	0.12%
8	0.04%
9	0.01%
<b>Grand Total</b>	<b>100.00%</b>

- Household type is not collected in housing register data; however the minimum number of bedrooms required gives us an idea of the sizes of the households. Almost three quarters of households waiting for social housing need a minimum of 2 or 3 bedrooms.
- As expected, larger households are more likely to be affected by overcrowding. 635 households within our own stock (Lewisham Homes) are overcrowded by more than one bedroom. Almost three quarters of these households have 5 or more occupants, suggestive of families with more children or multi-generational households.
- 812 households within our own stock are overcrowded by 0.5-1 bedroom. Almost half of this cohort are a household of 6 occupants.
- According to the 2014-based CLG household projections, the number of households with children is expected to increase by around 6,300 over the period 2018–2033.

### Religion

Religion	Count
Not disclosed	58.33%
Christian (all denominations)	23.93%
None	9.82%
Muslim	5.43%
Any other religion/belief	0.82%
Prefer not to say	0.74%
Buddhist	0.45%
Hindu	0.41%
Sikh	0.03%
Jewish	0.03%
<b>Grand Total</b>	<b>100.00</b> %

- Over 50% of housing register applicants have not disclosed a religion.
- Out of the remaining applicants, almost a quarter have identified as Christian. The next most prevalent declaration is 'no religion', following by Muslim.

Religion, overcrowded by 2 bed+	Count
Not disclosed	46.77%
Christian (all denominations)	28.67%
<b>Muslim</b>	<b>13.98%</b>
None	9.50%
Any other religion/belief	0.72%
Prefer not to say	0.18%
Buddhist	0.18%
<b>Grand Total</b>	<b>100.00</b> %

- When looking at households on the register that are overcrowded by 2 bedrooms or more, those who are Muslim are overrepresented (almost 14% even though they account for only 5.4% of the overall register), suggesting that any changes to policy relating to overcrowding may have a disproportionate affect on this group.
- Religion data not available for over 75% of Lewisham Homes tenants.
- For homelessness applications, religion data is held on less than 10% of clients, so meaningful analysis is not possible.

### Carer status

There is no data for carers within the housing register or homelessness applications.

### Sexual orientation

- Over half of applicants on the housing register have not disclosed their sexual orientation
- 44% have identified as straight / heterosexual
- Less than 1% have identified as gay, lesbian, bisexual or other.

#### Income

- By definition, applicants on the housing register are on low incomes and / or in receipt of housing benefit or Universal Credit

#### 4. Impact summary

A full impact is provided in the impact summary table, below.

#### 5. Mitigation

Mitigations are provided in the impact summary table, below.

#### 6. Service user journey that this decision or project impacts

Consultation contact: Jack skelly – [jack.skelly@lewisham.gov.uk](mailto:jack.skelly@lewisham.gov.uk)

If you think you may become homeless, you should contact the Council for advice at the earliest opportunity. The earlier you contact us the more chance we have of helping you to avoid becoming homeless. You can call the **Housing Options Centre [HOC]** on 020 8314 7007 or e-mail HOC at [www.housingoptionsenquiry@lewisham.gov.uk](mailto:www.housingoptionsenquiry@lewisham.gov.uk).

If you want to join the housing list you can do this by referring to our information on the website [www.lewisham.gov.uk](http://www.lewisham.gov.uk) or <http://www.lewisham.gov.uk/myservices/housing/find/Pages/Apply-for-social-housing.aspx>.

For advice about your housing options, please contact the **Allocations and Lettings Service** on 020 8314 7007.

If you are vulnerable (for example you are elderly, have learning or other disability, or do not have the ability to read English or another language) we can assist you in accessing housing and bidding for properties. The **Homesearch Support Officer**, based in the Allocations and Lettings Service, assists applicants to engage with the choice based lettings system and can assist clients with bidding. Please contact the Allocations and Lettings Service for further information on 020 8314 7007.

**Single Homelessness Intervention and Prevention (SHIP):** The Council is committed to working with partner agencies to promote housing options for single young people and there are a number of supported housing schemes that may be suitable for your needs funded throughout the borough. For more information on how to access these schemes please contact the SHIP service at [SHIP@lewisham.gov.uk](mailto:SHIP@lewisham.gov.uk) or 020 8314 7007.

<b>Signature of Head of Service</b>	
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For further information please see the full [Corporate Equality Policy](#).

**Table 2 – Equality Impact Assessment summary**

**Purpose of this document:** This table lists the proposed major change to the Allocations Policy, and indicates any protected characteristic group that may be positive or negatively impacted by the proposed change. The impacts have been assessed and potential mitigation explored.

The Council has limited data on the protected characteristics of applicants. Therefore we are unable to provide a detailed assessment of the impact of re-allocating groups, or forecast the impact with a significant degree of confidence.

Please note this is a working progress document and will continue to be updated throughout the policy update work.

#	Section	Proposed new policy	Protected characteristic groups potentially impacted by change	Assessment of impact	Mitigation
1	Allocation Scheme, 2.5.1-2.5.3	<p>1. Our proposed new banding is:</p> <ol style="list-style-type: none"> <li>1. Band 1: Emergency</li> <li>2. Band 2: High</li> <li>3. Band 3: Medium</li> <li>4. Band 4: Low</li> </ol> <p>2. The following band changes have been proposed:</p> <ol style="list-style-type: none"> <li>1. Homeless with additional need will be moved to “High”;</li> <li>2. Current cohorts within “High” band will be placed in “Medium” band (unless otherwise stated);</li> <li>3. Medical High moved in to “High” (instead of “Medium”);</li> <li>4. Supported Housing Move on moved to “High” (instead of “Medium”)</li> <li>5. We propose introducing an “overcrowded by 3 bed” cohort in “High”;</li> <li>6. All previous “Band 3 Priority” will remain in “Band 3 Medium Priority” except for:</li> <li>7. Overcrowded by 1 bed, which will be placed within “Low” priority.</li> </ol>	<ol style="list-style-type: none"> <li>1. Disability</li> <li>2. Religion</li> <li>3. Household type</li> <li>4. Age</li> <li>5. Ethnicity</li> <li>6. Gender</li> </ol>	<ol style="list-style-type: none"> <li>1. Placing rehousing reason groups in different Band Priorities, compared to the 2017 Policy, is likely to impact the length of time they will be on the housing register before securing a property.</li> <li>2. The Counsel has limited data on the protected characteristics of applicants. Therefore we are unable to provide a detailed assessment of the impact of re-allocating groups, or forecast the impact with a significant degree of confidence.</li> <li>3. We anticipate, however, that the proposed policies may impact in the following ways:</li> <li>4. Moving “overcrowded by two” in to Medium Priority, and “overcrowded by one” to Low Priority, may impact those with “religion”, “household type” or “ethnicity” protected characteristics. Individuals with these characteristics are more likely to have larger households than the national average, and so be experiencing overcrowding. Individuals of Black African ethnicity are disproportionately represented in the overcrowded cohort. Placing this rehousing reason in Band Three is likely to increase the time an applicant will wait in order to successfully bid for social housing.</li> </ol>	<ol style="list-style-type: none"> <li>1. We are introducing an “overcrowded by three” rehousing reason in Band Two. This will allow some larger households to move more quickly than they are currently able.</li> <li>2. Communications on policy changes will need to be sensitive to people’s language needs, as will our working processes and customer service delivery.</li> <li>3. Officials will monitor lets that are offered and keep data on protected characteristics to ensure groups are not discriminated against.</li> <li>4. The Council operates a number of services, including Allocations and Lettings service and Housing Options service, which provide advice to residents about their housing options. These can be contacted by phone or online and can provide guidance on what housing options are viable for applicants with a range of characteristics</li> </ol>

				<p>5. Implementing the proposed banding structure may allow those with a disability to move more quickly within the “medical high” rehousing reason, which will be placed within Band Two.</p> <p>6. Implementing the proposed banding structure may allow younger applicants to move more quickly within the “Supported Housing Move On” rehousing reason, which will be placed within Band Two.</p> <p>7. Implementing the proposed banding structure may allow individuals with specific “ethnicity”, “gender” and “age” characteristics to move more quickly within the “Homeless with additional need” rehousing reason, which will be placed within Band Two. Data suggests that:</p> <ol style="list-style-type: none"> <li>1. a disproportionate number of homelessness applications are from Black African and Black Caribbean ethnicities;</li> <li>2. a high number of applicants are aged between 26 and 35;</li> <li>3. The number of homelessness applications from young people aged 18-25 is significantly higher than the prevalence of this group on the housing register; and</li> <li>4. 57.8% of homeless applicants in the data extracted were female</li> </ol>	<p>5. The Council provides help for those who wish to access housing or bid for properties on the housing register that are vulnerable (e.g. those who are elderly, have a disability or do not have the ability to read English or another language)</p> <p>6. The Council also runs a number of social care pathways (e.g. the young persons’ pathway) and other support initiatives (Single Homeless Intervention and Prevention service) to support specific homeless cohorts.</p>
2	Allocation Scheme	<ol style="list-style-type: none"> <li>1. We propose ring-fencing properties, whereby Council ring-fences a percentage of properties to enable transfer of tenants (“smart letting”).</li> <li>2. We will ring-fence a set number of properties to residents who are both currently in social housing and on the housing list, so that they are able to move to a house more suited to their need.</li> </ol>	<ol style="list-style-type: none"> <li>1. Disability</li> <li>2. Age</li> <li>3. Religion</li> <li>4. Ethnicity</li> </ol>	<ol style="list-style-type: none"> <li>1. Smart letting will prioritise initially transferring applicants but overall the impact of the policy will be neutral as the properties that are released from the transferring tenants will go to non-transferring applicants.</li> <li>2. Smart letting may improve the likelihood of individuals with “disability” characteristics successfully bidding for a property, as scarce properties that are suitable for those with</li> </ol>	<ol style="list-style-type: none"> <li>1. Officials will monitor lets that are offered via the ‘smart lettings’ scheme and keep data on protected characteristics to ensure groups are not discriminated against.</li> <li>2. Communications on policy changes will need to be sensitive to people’s language needs, as will</li> </ol>



				<p>disabilities may be let using this system. 16% of applicants on the housing register have declared a disability. As at August 2020, there were 149 households on the housing register awaiting accessible social housing. 109 of these households were already in social housing not currently suitable for their needs. At least 15 were in temporary accommodation.</p>	<p>our working processes and customer service delivery.</p>
3	<p>Allocation Scheme, 2.2.</p>	<p>1. We propose changing the Three Offer rule to a Two Offer rule</p>	<ol style="list-style-type: none"> <li>1. Disability</li> <li>2. Ethnicity</li> <li>3. Religion</li> <li>4. Age</li> <li>5. Household type</li> <li>6. Gender</li> </ol>	<ol style="list-style-type: none"> <li>1. Reducing the number of offers for “overcrowded by two” and “overcrowded by one” to One Offer, may impact those with “religion”, “household type” or “ethnicity” protected characteristics. Individuals with these characteristics are more likely to have larger households than the national average, and so be experiencing overcrowding who will have a reduced number of refusals for properties. Individuals of Black African ethnicity are disproportionately represented in the overcrowded cohort.</li> <li>2. Reducing the number of offers for those with specially adapted homes, “medical high” and “medical low” rehousing reasons may impact individuals with “disability” who will have a reduced number of refusals for properties.</li> <li>3. Implementing the reduced number of offers may impact individuals with specific “ethnicity” and “age” characteristics to, as this will reduce the number of refusals those with “Homeless with additional need” and “homeless without additional need” rehousing reasons can make. Data suggests that: <ol style="list-style-type: none"> <li>1. a disproportionate number of homelessness applications are from Black African and Black Caribbean ethnicities;</li> <li>2. a high number of applicants are aged between 26 and 35;</li> </ol> </li> </ol>	<ol style="list-style-type: none"> <li>1. The Council provides help for those who wish to access housing or bid for properties on the housing register that are vulnerable (e.g. those who are elderly, have a disability or do not have the ability to read English or another language)</li> <li>2. The Council operates a number of services, including Allocations and Lettings service and Housing Options service, which provide advice to residents about their housing options. These can be contacted by phone or online and can provide guidance on what housing options are viable for applicants with a range of characteristics</li> <li>3. Officials will monitor lets that are offered via the ‘smart lettings’ scheme and keep data on protected characteristics to ensure groups are not discriminated against.</li> <li>4. The Council also runs a number of social care pathways (e.g. the young persons’ pathway) and other support initiatives (Single</li> </ol>

				<ul style="list-style-type: none"> <li>3. The number of homelessness applications from young people aged 18-25 is significantly higher than the prevalence of this group on the housing register; and</li> <li>4. 57.8% of homeless applicants in the data extracted were female</li> </ul>	<p>Homeless Intervention and Prevention service) to support specific homeless cohorts.</p> <ul style="list-style-type: none"> <li>5. Communications on policy changes will need to be sensitive to people’s language needs, as will our working processes and customer service delivery.</li> </ul>
4	Allocation Scheme, 3.1.8	<ul style="list-style-type: none"> <li>1. We propose updating bidding procedure so that applicants can bid for multiple properties per week. If the applicant successfully bid for multiple properties, they would only be eligible to view one property, which would be the property for which they stated their highest preference.</li> </ul>	<ul style="list-style-type: none"> <li>1. None</li> </ul>		<ul style="list-style-type: none"> <li>1. The Council provides help for those who wish to access housing or bid for properties on the housing register that are vulnerable (e.g. those who are elderly, have a disability or do not have the ability to read English or another language)</li> </ul>
5	How the Policy is applied, 3.3.1	<ul style="list-style-type: none"> <li>1. We propose excluding adult children over 21 from calculating how many bedrooms are required for the new band ‘overcrowded by 3 bed’, unless they are dependents or are caring for a main households member</li> </ul>	<ul style="list-style-type: none"> <li>1. Age</li> <li>2. Religion</li> <li>3. Ethnicity</li> <li>4. Household type</li> </ul>	<ul style="list-style-type: none"> <li>1. Excluding adult children over 21 from the higher banded ‘overcrowded by 3 bed’ may impact those with “religion” or “ethnicity” protected characteristics. Individuals with these characteristics are more likely to have larger households than the national average, with adult children staying with their parents for longer. Individuals of Black African ethnicity are disproportionately represented in the overcrowded cohort.</li> <li>2. Excluding adult children over 21 impacts those with “age” characteristics. We do not have detailed data on the number of adult children living in large properties with their parents but where this is the case, these families will not be able to access the higher band 2 and will be behind those large families with children in the waiting list.</li> </ul>	<ul style="list-style-type: none"> <li>1. Officials will monitor lets that are offered and keep data on protected characteristics to ensure groups are not discriminated against.</li> <li>2. The Council operates a number of services, including Allocations and Lettings service and Housing Options service, which provide advice to residents about their housing options. These can be contacted by phone or online and can provide guidance on what housing options are viable for applicants with a range of characteristics</li> <li>3. The Council provides help for those who wish to access housing or bid for properties on the housing register that are vulnerable (e.g. those who are elderly, have a disability or do not</li> </ul>

					<p>have the ability to read English or another language)</p> <ol style="list-style-type: none"><li>4. Adult children who are dependents or who are carers for a main household member will be included in bedroom calculations</li><li>5. The Smart letting scheme may enable larger properties to be accessed by transferring tenants and so may reduce the time families with these characteristics have to wait to secure a property.</li><li>6. Communications on policy changes will need to be sensitive to people's language needs, as will our working processes and customer service delivery.</li></ol>
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