

APPENDIX C

SSA EQUALITY IMPACT AND NEEDS ASSESSMENT

Directorate	Housing and Regeneration
Service Area	Housing
Service/policy/function being assessed	Tenancy Strategy
Which borough (s) does the service/policy apply to	Richmond
Staff involved	Michael Shearon Weller
Date approved by Directorate Equality Group (if applicable)	22/02/2019
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	22/02/2019
Date submitted to Directors' Board	22/02/2019

SUMMARY**Please summarise the key findings of the EINA.****Positive:**

- The most significant change proposed in the strategy is to extend the minimum length of 'flexible tenancies' the Council expects registered providers to grant from five to ten years.
- This proposal, if introduced into local registered providers' tenancy policies, would most affect those on the housing register - especially those on the homeless queue (as almost 50% of offers of social housing are made to this queue).
- Although the proposed strategy set out in this report will apply to new tenants of social housing regardless of their age, young people are most likely to be affected by this change in policy if registered providers have due regard to this strategy and likewise extend the length of FFT tenancies offered to ten years.
- It is not envisaged that this policy will especially affect people aged over 55. This is partly because new tenancies are most likely to be offered to people below this age bracket (82% in 2017/18).
- As 29.5% of accepted homeless cases were recorded as having a priority need reason of mental illness/ handicap or physical disability, if this proposal to extend the length of FFT tenancies is adopted by registered providers locally, then disabled households would benefit from this as security of tenure is particularly beneficial to people with a disability as it can often be difficult to find accommodation which is suitable and the stress of moving may in particular affect those with severe mental health issues.
- The increase in security of tenure for FFT tenants, if introduced by local registered providers, would in particular be beneficial to lone female parents as this group are those most at risk of homelessness. The proposed change to increase FFT tenancies to ten years will help lone female parents who have made successful homeless applications, and their children, find much needed stability after likely spending years in temporary accommodation.

- Although this is a relatively small percentage of new prospective social housing tenants the housing register, the new policy would in particular be beneficial to new parents who, if forced to move, may find the moving process more stressful and difficult than households without children or with older children.
- The Council proposes that the increased security of tenure, that ten year FFT tenancies would provide if adopted by local registered providers, will benefit people of all ethnic groups, especially those from an Asian ethnic group as this is the most overrepresented group in on the housing register/ accepted as homeless.
- The Council does not foresee any negative impact on new social housing tenants in Richmond resulting from register providers following the Council's expectation of having regard to London Affordable Rent (LAR) levels when setting their own rents. In Appendix B, the Council has found that LAR levels are affordable for residents, even if wholly reliant on benefits.
- As Affordable Rent levels do not include service charges, the Council expects registered providers to have special regard to the service charges imposed on residents of low income households, always ensuring that these charges are affordable, when considered alongside the weekly rent amount. If this is done, the Council sees the move to LAR as beneficial for new social housing tenants and foresees no negative impact.

Negative:

- Data on sexual orientation and religion has not historically been collected in relation to housing and homelessness. The Homelessness Reduction Act now requires local authorities to provide information to the Ministry of Housing Communities and Local Government (MHCLG) on the religion and sexual orientation of applicants presenting as homeless (H-CLIC data). This came into force in April 2018, therefore it is too early to use this data to inform this strategy, but the data will be available to inform future policy and decision making.

1. Background

Briefly describe the service/policy or function:

The Council is required by the Regulatory Framework for Social Housing in England to publish clear and accessible policies including a Tenancy Strategy.

Richmond upon Thames is a large scale voluntary transfer authority and no longer carries out a landlord function in relation to social housing. The Council in its strategic housing role is therefore keen to guide its registered provider partners to meet local housing needs and priorities, as outlined in the Tenancy Strategy.

The Localism Act 2011 requires all Local Authorities to provide information that registered providers will have 'regard' to in relation to a) the type of tenancies registered providers grant, b) the circumstances in which they will grant a tenancy of a particular kind, c) where they grant tenancies for a fixed term the duration of the term and d) the circumstances in which they will grant a further tenancy on the expiry of a fixed term tenancy.

The most significant change proposed in the Strategy is to extend the minimum length of 'flexible tenancies' the Council expects registered providers to grant from five to ten years. It also sets out the Council's policy position on 'Affordable Rent', encouraging registered providers to move towards London Affordable Rent levels.

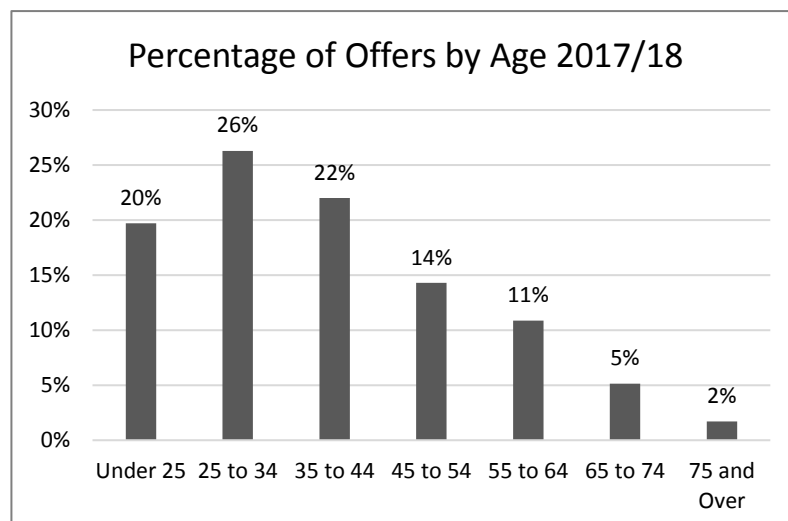
In line with legislative requirements, the Council's proposed Strategy continues to outline the Council's position on the type, duration and renewal of tenancies available to registered providers in Richmond upon Thames. The Council expects the new Strategy to have no new impact on people with protected characteristics, except in these two main changes referred to above, which are considered in the following assessment.

2. Analysis of need and impact

Protected group	Findings																											
Age	<u>Borough population (2011 Census):</u>																											
	<table><tr><th>Age</th><th>2011</th><th>%</th></tr><tr><td>0 - 14</td><td>34,900</td><td>17%</td></tr><tr><td>15-24</td><td>18,200</td><td>9%</td></tr><tr><td>25-34</td><td>28,500</td><td>14%</td></tr><tr><td>35-44</td><td>33,300</td><td>17%</td></tr><tr><td>45-54</td><td>26,300</td><td>13%</td></tr><tr><td>55-64</td><td>20,200</td><td>10%</td></tr><tr><td>65-74</td><td>13,000</td><td>7%</td></tr><tr><td>75+</td><td>25,200</td><td>13%</td></tr></table>	Age	2011	%	0 - 14	34,900	17%	15-24	18,200	9%	25-34	28,500	14%	35-44	33,300	17%	45-54	26,300	13%	55-64	20,200	10%	65-74	13,000	7%	75+	25,200	13%
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<p>The Borough has a higher percentage of residents over the age of 65 (20%) than the national average (16%). The population aged 65 and over is expected to increase by 55% by 2035.</p>																												
<u>Queues/Allocations population by age:</u>																												
Applicants (number of households on the Housing Register 2017/18) by age:																												
<div><p>Percentage of Applicants by Age</p><table><tr><th>Age</th><th>No.</th><th>%</th></tr><tr><td>Under 25</td><td>469</td><td>12%</td></tr><tr><td>25 to 34</td><td>1355</td><td>34%</td></tr><tr><td>35 to 44</td><td>996</td><td>25%</td></tr><tr><td>45 to 54</td><td>567</td><td>14%</td></tr><tr><td>55 to 64</td><td>308</td><td>8%</td></tr><tr><td>65 to 74</td><td>151</td><td>4%</td></tr><tr><td>75 and Over</td><td>98</td><td>2%</td></tr></table></div>	Age	No.	%	Under 25	469	12%	25 to 34	1355	34%	35 to 44	996	25%	45 to 54	567	14%	55 to 64	308	8%	65 to 74	151	4%	75 and Over	98	2%				
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Despite making up only 14% of the Borough demographic, 34% of applicants on the housing register were between the ages of 25 and 34. There are significantly fewer applicants on the housing register over the age of 65 (6%) compared to in the Borough as a whole (20%).

Allocations (number of offers made to the Housing Register 2017/18) by age:



Offers:		
Age	No.	%
Under 25	69	20%
25 - 34	92	26%
35 - 44	77	22%
45 - 54	50	14%
55 - 64	38	11%
65 - 74	18	5%
75+	6	2%

The biggest difference between the age breakdown of applications on the housing register in comparison to offers made to those on the register is for people aged under 25. Although only making up 12% of the register, 20% of all offers were made to this age group. In contrast, 26% of offers were made to those aged 25 to 34, despite making up 34% of the housing register.

Disability

Borough population (2011 Census):

Estimated Borough population (Market Position Statement 2018)

	Total Number	%
Learning Disabilities (18-64)	3,683	2%
Physical Disability or sensory impairment (18-64)	12,582	6%
Mental Health (18-64)	20,408	10%
Total	36,673	18%

18% of residents in the Borough are estimated to have a disability, compared with 16% of the national average for people of working age.

	People with a disability are disproportionately represented in accepted homeless cases. 29.5% of cases were accepted where the main priority need reason was mental illness/ handicap (22%) or physical disability (7.5%).																																										
Gender (sex)	<u>Borough population:</u>																																										
	Census 2011 – Population Estimates for 2018 (GLA):																																										
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	<p>The gender breakdown of offers made to those on the housing register differs from the gender breakdown of applicants on the housing register. Despite making up 30% of the register, only 19% of offers are made to female applicants without children. The opposite is true of males without children, who represent almost the same percentage total of applicants on the register (29%), however, offers were made to this cohort in 34% of cases in 2017/18.</p>																					
	<p><u>Housing Advice:</u></p> <p>Accepted homeless applications by gender 2017/18:</p> <table><tr><th>Gender</th><th>No.</th><th>%</th></tr><tr><td>Female with children</td><td>96</td><td>46%</td></tr><tr><td>Female without children</td><td>36</td><td>17%</td></tr><tr><td>Male with children</td><td>9</td><td>4%</td></tr><tr><td>Male without children</td><td>40</td><td>19%</td></tr><tr><td>Joint with children</td><td>24</td><td>12%</td></tr><tr><td>Joint without children</td><td>2</td><td>1%</td></tr></table> <p>Almost half (46%) of accepted homeless cases in 2017/18 were households comprising of a single female with children. Therefore, as the homeless queue is prioritised, it is expected that there will continue to be a high percentage of offers made to single parents over the following years (it usually takes between 1-3 years to be made an offer after being accepted as homeless by the Council).</p> <p>Domestic Violence</p> <p>13% of accepted homeless cases had domestic violence as the recorded reason for homelessness. This equates to 27 acceptances in 2017/18 and has an impact on the disproportionately high number of single parents applying as homeless.</p>	Gender	No.	%	Female with children	96	46%	Female without children	36	17%	Male with children	9	4%	Male without children	40	19%	Joint with children	24	12%	Joint without children	2	1%
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Marriage and civil partnership	<p><u>Borough population (Census 2011):</u></p> <table><tr><th>Marital status</th><th>Total Number</th><th>%</th></tr><tr><td>Married, civil partnership or cohabiting</td><td>115,940</td><td>61%</td></tr></table>	Marital status	Total Number	%	Married, civil partnership or cohabiting	115,940	61%															
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Pregnancy and paternity.	<p>Housing Advice:</p> <p>6.5% (14) of accepted homelessness cases in 2017/18 were found to be in priority need as the household included a pregnant woman where there were no other dependent children in the household. This is in keeping with the London average of 6%.</p>																																							
Race/ ethnicity	<p><u>Borough population (Census 2011):</u></p> <table><tr><th>Ethnicity</th><th>No.</th><th>%</th></tr><tr><td>Asian/Asian British</td><td>13,090</td><td>7%</td></tr><tr><td>Black/African/Caribbean/Black British</td><td>1,870</td><td>1%</td></tr><tr><td>Mixed/Multiple Ethnic Groups</td><td>7,480</td><td>4%</td></tr><tr><td>Other Ethnic Groups</td><td>3,740</td><td>2%</td></tr><tr><td>White</td><td>160,820</td><td>86%</td></tr></table> <p>Only 14% of the Borough’s residents are from a BAME ethnic group. After white ethnic group, the second largest representation is Asian/ Asian British at 7%.</p> <p><u>Queues/Allocations population:</u></p> <p>Applications (number of households on the Housing Register 2017/18) by ethnicity:</p> <div><div><p>Percentage of Applicants by Ethnic Group 2017/18</p></div><table><tr><th>Ethnicity</th><th>No.</th><th>%</th></tr><tr><td>White</td><td>2618</td><td>66%</td></tr><tr><td>Mixed/ Multiple Ethnic</td><td>196</td><td>5%</td></tr><tr><td>Asian/ Asian British</td><td>384</td><td>10%</td></tr><tr><td>Black/ Caribbean/ Black British</td><td>310</td><td>8%</td></tr><tr><td>Other Ethnic Group</td><td>148</td><td>4%</td></tr><tr><td>Unknown</td><td>286</td><td>7%</td></tr></table></div> <p>Applicants (number of offers made to the Housing Register 2017/18) by ethnicity:</p>	Ethnicity	No.	%	Asian/Asian British	13,090	7%	Black/African/Caribbean/Black British	1,870	1%	Mixed/Multiple Ethnic Groups	7,480	4%	Other Ethnic Groups	3,740	2%	White	160,820	86%	Ethnicity	No.	%	White	2618	66%	Mixed/ Multiple Ethnic	196	5%	Asian/ Asian British	384	10%	Black/ Caribbean/ Black British	310	8%	Other Ethnic Group	148	4%	Unknown	286	7%
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<p>There are marginal differences between the ethnic representation of households on the housing register and actual housing offers made. The biggest difference is that 5% fewer offers are made to White households (66% on the housing register and 61% offers made). Otherwise, 4% more offers are made to Asian households (10% on the housing register and 14% offers made) and the same percentage of offers are made to Black households as are on the register (8%).</p>																						
<p><u>Housing Advice:</u></p> <p>Accepted homeless applications by ethnicity 2017/18:</p> <table><tr><th>Ethnicity</th><th>No.</th><th>%</th></tr><tr><td>White</td><td>123</td><td>59%</td></tr><tr><td>Mixed/ Multiple Ethnic</td><td>13</td><td>6%</td></tr><tr><td>Asian/ Asian British</td><td>37</td><td>18%</td></tr><tr><td>Black/ Caribbean/ Black British</td><td>19</td><td>9%</td></tr><tr><td>Other Ethnic Group</td><td>6</td><td>3%</td></tr><tr><td>Unknown</td><td>9</td><td>4%</td></tr></table> <p>Although by far the most represented ethnic group accepted as homeless was White households in 2017/18 (59%), Asian households accepted as homeless (18%) are overrepresented compared to the Borough demographic (7%). It is likely, therefore that the percentage of offers made to Asian households will increase over the following years due to the priority given to the homeless queue on the housing register.</p>	Ethnicity	No.	%	White	123	59%	Mixed/ Multiple Ethnic	13	6%	Asian/ Asian British	37	18%	Black/ Caribbean/ Black British	19	9%	Other Ethnic Group	6	3%	Unknown	9	4%	
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<p>Religion and belief,</p>	<p><u>Borough population:</u></p> <p><u>Census 2011:</u></p>																					

Tenancy Strategy – Equality Impact and Needs Assessment

including non-belief	Faith	No
	Buddhist	1,870
	Christian	102,850
	Hindu	3,740
	Jewish	1,870
	Muslim	5,610
	Sikh	1,870
	Other Religion	0
	No Religion	52,360
	No Response	16,830
Richmond Council has not historically collected data on the religious beliefs of homeless applicants or applicants to the housing register.		
Sexual orientation	<u>Borough population:</u> <u>Census 2011:</u> Richmond Council has not historically collected data on the sexual orientation of homeless applicants or applicants to the housing register.	

3. Impact

Protected group	Positive	Negative
Age	<p>The most significant change proposed in the strategy is to extend the minimum length of 'flexible tenancies' the Council expects registered providers to grant from five to ten years.</p> <p>This proposal, if introduced into local registered providers' tenancy policies, would most affect those on the housing register - especially those on the homeless queue (as almost 50% of offers of social housing are made to this queue).</p> <p>Although the proposed strategy set out in this report will apply to new tenants of social housing regardless of their age, the age group with the highest percentage of offers made to the housing register is 25-34 (26%). Additionally, there was a</p>	None identified

	<p>disproportionate number of people made offers to under 25 (20% compared to 12% on the register). Therefore, young people are most likely to be affected by this change in policy if registered providers have due regard to this strategy and likewise extend the length of FFT tenancies offered to ten years.</p> <p>The Council considers that this policy offers new tenants to social housing more security of tenure, in line with the rhetoric posed by the Government in the Social Housing Green Paper.</p> <p>It is not envisaged that this policy will especially affect people aged over 55. This is partly because new tenancies are most likely to be offered to people below this age bracket (82% in 2017/18) and the proposal has maintained the Council's support of offering sheltered housing tenants (55+) an assured tenancy in normal circumstances, and FFT tenancies only in exceptional circumstances (in cases of repeated rent arrears or ASB).</p> <p>The Council does not foresee any negative impact resulting from register providers using rents similar to LAR levels on people of any age group.</p>	
Disability	<p>As 29.5% of accepted homeless cases were recorded as having a priority need reason of mental illness/ handicap or physical disability, if this proposal to extend the length of FFT tenancies is adopted by registered providers locally, then disabled households would benefit from this as security of tenure is particularly beneficial to people with a disability as it can often be difficult to find accommodation which is suitable and the stress of moving may in particular affect those with severe mental health issues.</p>	None identified

	<p>The Council does not foresee any negative impact on disabled tenants or household members as a result of the changes made to its Tenancy Strategy.</p> <p>The Council does not foresee any negative impact resulting from register providers using rents similar to LAR levels on people with a disability. For people with a disability reliant on welfare benefits, the lower rents associated with LAR levels could make their properties more affordable.</p>	
Gender (sex)	<p>Lone female parents will especially be affected by the changes to FFT tenancies, if registered providers extend the minimum length of FFT tenancies as the Council sets as an expectation in its Strategy as they are the most represented gender/ household group accepted as homeless in 2017/18 (46%) and made up 28% of total offers made to the register in 2017/18.</p> <p>The increase in security of tenure for FFT tenants would in particular be beneficial to lone female parents as this group are those most at risk of homelessness. The proposed change to increase FFT tenancies to ten years will help lone female parents who have made successful homeless applications, and their children, find much needed stability after likely spending years in temporary accommodation.</p> <p>The Council does not foresee any negative impact resulting from register providers using rents similar to LAR levels on people of any gender.</p>	None identified
Gender Identity	<p>This change in policy, if adopted by local registered providers, provides more security of tenure to all potential new social housing tenants. Which</p>	<p>Information is limited on the transgender population in the borough in relation to housing and homelessness. The Council will improve its collection of data to ensure that better information is</p>

	would in particular be beneficial to the Borough's most vulnerable residents.	collected in the future, so that accurate equalities information is held to identify the impact on gender identity.
Marriage and civil partnership	Joint applicants made up only 13% of total accepted homeless households in 2017/18. This is similarly the case on the housing register (14%) and for offers made to the housing register (14%). The proposed changes in this policy would most benefit households with one parent, although they will also benefit those who are married or in civil partnerships and no negative impact is expected for this cohort.	None identified
Pregnancy and maternity	<p>6.5% of homelessness acceptances in 2017/18 were found to be in priority need as the household included a pregnant woman and there were no dependent children in the household.</p> <p>Although this is a relatively small percentage of new prospective social housing tenants the housing register, the new policy would in particular be beneficial to new parents who, if forced to move, may find the moving process more stressful and difficult than households without children or with older children.</p> <p>The Council does not foresee any negative impact resulting from register providers using rents similar to LAR levels on people who are pregnant. The lower rents associated with LAR levels could make their properties more affordable, especially when considering the costs involved with newborn children.</p>	None identified
Race/ethnicity	When compared to the borough population stats, people belonging to an Asian ethnic group are over represented. This is true on the housing register (10%), offers made to the register (14%) and accepted homeless cases (18%) when compared to the borough population as	

	<p>a whole (7%). People belonging to an Asian ethnic group in the borough, therefore, are particularly more likely to benefit from the proposed change in policy, especially the improved security of tenure of ten rather than five year FFT tenancies.</p> <p>The Council proposes that the increased security of tenure, that ten year FFT tenancies would provide if adopted by local registered providers, will benefit people of all ethnic groups.</p> <p>The Council does not foresee any negative impact resulting from register providers using rents similar to LAR levels on people of any ethnicity.</p>	
Religion and belief, including non belief	<p>This change in policy, if adopted by local registered providers, provides more security of tenure to all potential new social housing tenants. Which would in particular be beneficial to the Borough's most vulnerable residents.</p>	<p>Historically, information has been limited on religion and belief in relation to housing and homelessness. The Homelessness Reduction Act now required local authorities to provide information on the religious beliefs of applications presenting as homeless (H-CLIC data). This came into force in April 2018, therefore it is too early to use this data to inform this strategy, but the data will be available to inform future policy and decision making.</p>
Sexual orientation	<p>This change in policy, if adopted by local registered providers, provides more security of tenure to all potential new social housing tenants. Which would in particular be beneficial to the Borough's most vulnerable residents.</p>	<p>Historically, information has been limited on sexual orientation in relation to housing and homelessness. The Homelessness Reduction Act now requires local authorities to provide information on the sexual orientation of applications presenting as homeless (H-CLIC data). This came into force in April 2018, therefore it is too early to use this data to inform this strategy, but the data will be available to inform future policy and decision making.</p>

4. Data gaps

Data gap(s)	How will this be addressed?
Sexual orientation, religion, disability and gender identity.	<p>The changes will be monitored across all groups and recording of tenants protected characteristics have been improved by the redesign of the online housing and homeless application forms. HRA 2017 compliant H-CLIC data is collected for homeless applicants – as of April 2018. This includes religion, sexual orientation and disability.</p> <p>The Council does not currently have any plans to collect data on gender identity for housing and homeless applications.</p>

5. Actions

Action	Lead Officer	Deadline
None		

6. Consultation

This EINA will be open to a public six week consultation alongside the proposed Tenancy Strategy, if approved by Cabinet in April 2019.
