

# SSA EQUALITY IMPACT AND NEEDS ANALYSIS

<b>Directorate</b>	<b>Housing and Regeneration</b>
<b>Service Area</b>	<b>Housing Management</b>
<b>Service/policy/function being assessed</b>	<b>Building Safety Resident Engagement Strategy</b>
<b>Which borough (s) does the service/policy apply to</b>	Wandsworth
<b>Staff involved in developing this EINA</b>	<b>Martina Kane</b>
<b>Date approved by Directorate Equality Group (if applicable)</b>	
<b>Date approved by Policy and Review Manager</b> All EINAs must be signed off by the Policy and Review Manager	30/07/2024 – Jamie Fisher
<b>Date submitted to Directors’ Board</b>	

## 1. Summary

**Please summarise the key findings of the EINA.**

This EINA has been produced to support Paper No.XXXX and the attached draft Building Safety Resident Engagement Strategy, which details how the Council will engage with residents living in high-rise buildings, defined as a building at least 18 metres in height, or 7 storeys or more, about fire and building safety decisions.

The Council currently own and manage 148 high-rise buildings and are responsible for ensuring that these buildings are maintained and all safety concerns addressed in a timely manner. Within the Council, there are a number of teams that share a responsibility for managing building safety and monitoring compliance.

The key objectives of this strategy are:

- **Keeping residents informed:** We want you to feel assured that safety risks in your building are being effectively addressed. This will be done by providing the relevant information so everyone understands the roles and responsibilities of those managing and living in our buildings.
- **Involving residents in decision-making:** As a resident living in a high-rise block, you should have various opportunities to participate in the management and decision making about your building. When a safety concern is made, this will be taken seriously.
- **Listening and acting on feedback:** We will listen to you and your neighbours. We will make it easier for you to report a concern or make a complaint and know what happens next.

The Council will listen and act on feedback through our formal & informal participation structures, such as our Residents Associations, Area Housing Panels, Borough Residents’ Forum, Fire Safety Steering Group and Housing Community Champions.

The policies and practices in the Strategy will not impact negatively on any groups of people who have one or more protected characteristic, and the range of proposed activities aims to increase engagement across all resident groups by offering a wider variety of means for residents to get involved with a specific focus on fire and building safety.

The Department also commits to making reasonable adjustments for residents who wish to be engaged in these activities although may have a limitation that prevents them; in such cases, officers will have a chat with the residents to determine what adjustment can be made to ensure no resident is left out.

**2. Evidence gathering and engagement.**

**a. What evidence has been used for this assessment? For example, national data, local data via DataRich or DataWand**

Evidence	Source
Data from our internal records	Number of existing Council tenants (by ethnicity, age, disability and gender) as of 31st March 2024.

**b. Who have you engaged and consulted with as part of your assessment?**

Individuals/Groups	Consultation/Engagement results	Date	What changed as a result of the consultation
Public consultation / in particular residents living in high-rise blocks	The Strategy will be going out to consultation along with the EINA	TBC	TBC

**3. Analysis of need**

As per the *data gaps* section below, the Department cannot provide comparative data on leaseholders in Council-managed properties and on existing residents who are actively involved in the Department’s participation structures. However, the demographic profile of the Departments social housing tenants can be provided for some of the protected groups listed below. Therefore, although there are some data limitations, this should not hinder the assessment of this EINA since the draft Strategy aims to increase the number of participation routes and improve engagement on building safety to all residents, and this also includes making reasonable adjustments and being flexible to residents regardless of their characteristics.

[Housing and equalities - Wandsworth Borough Council](#)

**Potential impact on this group of residents and actions taken to mitigate impact and advance equality, diversity and inclusion**

Protected group	Findings
Age	<p><u>Tenant profile (as of 31/03/2024)</u></p> <p>The age profile of tenants living in our high-rise buildings (7 storeys and over) show those in the younger age groups, 54 years and under, are more likely to reside in such buildings,</p>

compared to the tenant profile of our housing stock overall. In particular, there are 5% more tenants aged 25-34 and 4% more tenants aged 35-44 living in our high-rise stock compared to our housing stock overall. This is to be expected, as older tenants would be more likely to move to lower-level accommodation, or properties designated for older people, which are more likely to be low-rise.

Age Group	WBC Tenant profile*		WBC Tenant profile (high rise)	
	No. of tenants	% of tenants	No. of tenants	% of tenants
Under 25	226	1%	110	2%
25 to 34	1632	10%	752	15%
35 to 44	3046	18%	1119	22%
45 to 54	3389	20%	1057	21%
55 to 64	3878	23%	1108	22%
65 to 74	2390	14%	526	10%
75+	2047	12%	403	8%
Total	16608	100%	5075	100%

\* three tenants removed due to undisclosed age

**Disability**

Tenant profile (as of 31/03/2024)

Our tenant profile shows that those living in Council managed accommodation with a physical disability account for 9% of the tenant population, compared to 4% of those living in our high-rise buildings. This is to be expected, as those with a physical disability are more likely to live in accommodation that has been adapted to suit their needs, such as adapted homes with ramp access, or fewer stairs, for example.

Disability*	WBC Tenant profile		WBC Tenant profile (high rise)	
	No. of tenants	% of tenants	No. of tenants	% of tenants
No	15153	91%	4854	96%
Yes	1458	9%	223	4%
Total	16611	100%	5077	100%

\* data is only known of tenants with physical disabilities

**Sex**

Tenant profile (31/03/2024)

	<p>Our overall tenant profile shows that females account for 67% and males 33%, which is similar to the tenant profile for those living in high-rise accommodation, which accounts for 68% females and 32% males.</p> <table border="1" data-bbox="328 349 1538 618"> <thead> <tr> <th rowspan="2">Gender</th> <th colspan="2">WBC Tenant profile*</th> <th colspan="2">WBC Tenant profile (high rise)</th> </tr> <tr> <th>No. of tenants</th> <th>% of tenants</th> <th>No. of tenants</th> <th>% of tenants</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>11163</td> <td>67%</td> <td>3458</td> <td>68%</td> </tr> <tr> <td>Male</td> <td>5446</td> <td>33%</td> <td>1619</td> <td>32%</td> </tr> <tr> <td>Total</td> <td>16609</td> <td>100%</td> <td>5077</td> <td>31%</td> </tr> </tbody> </table> <p>* two tenants removed due to undisclosed gender</p>	Gender	WBC Tenant profile*		WBC Tenant profile (high rise)		No. of tenants	% of tenants	No. of tenants	% of tenants	Female	11163	67%	3458	68%	Male	5446	33%	1619	32%	Total	16609	100%	5077	31%
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<p><b>Gender reassignment</b></p>	<p><u>Resident population (ONS Census 2021):</u></p> <p>The 2021 Census collected data on gender identity for the first time and the question was voluntary and only asked of people aged 16 and above. 254,037 (92.86%) said their gender identity was the same as their sex registered at birth.</p> <p>In total, 1,691 (0.62%) Wandsworth residents indicated a change in gender identity with 713 (0.26%) stating their gender identity was different to that of birth but did not provide a response to what they identified with. Of the 1,690 residents who indicated a change in gender identity, there was an even split between males and females. 347 identified as trans woman and 304 identified as trans man. 182 Wandsworth residents identified as non-binary.</p> <p><u>Tenant profile:</u></p> <p>The Housing and Regeneration Department does not currently hold comparative tenant or applicant data on this group.</p>																								
<p><b>Marriage and civil partnership</b></p>	<p><u>Resident population (ONS Census 2021):</u></p> <p>Of Wandsworth residents aged 16 years and over, 55.8% said they had never been married or in a civil partnership.</p> <p>We know that there are higher numbers of single mothers in social housing and know that 18% of social rented households nationally are lone parent households.</p> <p><a href="https://www.gov.uk/government/statistics/english-housing-survey-2021-to-2022-social-rented-sector">English Housing Survey 2021 to 2022: social rented sector - GOV.UK (www.gov.uk)</a></p>																								
<p><b>Pregnancy and maternity</b></p>	<p><u>Resident population:</u></p>																								

In 2020, the birth rate in Wandsworth was 46.5 per 1000 females of childbearing age (15-44 years) (Office of National Statistics 2020).

Tenant profile:

The Housing and Regeneration Department does not currently hold comparative tenant or applicant data on this group.

**Race/ethnicity** Tenant profile (as of 31/03/2024)

Ethnicity	WBC Tenant profile		WBC Tenant profile (high rise)	
	No. of tenants	% of tenants	No. of tenants	% of tenants
Asian	1773	11%	516	10%
Black	5105	31%	1799	35%
Mixed	558	3%	188	4%
Other	754	5%	275	5%
Unknown	2127	13%	608	12%
White	6294	38%	1691	33%
Total	16611	100%	5077	100%

When looking at each protected group of tenants from Black, Asian and Minority Ethnic backgrounds there are differences between each ethnic group with tenants from the Black ethnic group representing 31% of all Wandsworth Council tenants when compared to the Asian ethnic group who represent 10% of all tenants. Both the Black and Asian ethnic group each represent 11% of all residents in the borough. Tenants from the Black ethnic group make up a higher proportion of high-rise tenancies than the overall housing stock, and tenants from the White ethnic group making up a lower proportion of high-rise tenancies than the overall borough housing stock.

A full breakdown of the tenant profile by each ethnic group can be found in our annual equalities report (<https://www.wandsworth.gov.uk/housing/about-thehousing-department/housing-and-equalities/>).

**Religion and belief, including non belief** Resident population (ONS Census 2021):

Religion	% of residents
No religion	36.2%
Christian	42.6%
Buddhist	0.7%
Hindu	2.0%
Jewish	0.5%
Muslim	9.9%
Sikh	0.3%

	<table border="1"> <tr> <td>Other</td> <td>0.6%</td> </tr> <tr> <td>No answer</td> <td>7.2%</td> </tr> </table>	Other	0.6%	No answer	7.2%	<p><u>Tenant profile</u></p> <p>The Housing and Regeneration Department does not currently hold Religion and belief, including non-belief, data on tenants.</p>														
Other	0.6%																			
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<p><b>Sexual orientation</b></p>	<p><b>Resident population (ONS Census 2021):</b></p> <p>The 2021 Census collected data on sexual orientation for the first time and the question was voluntary and only asked of people aged 16+. 14,148 (5.2%) of 16+ year olds were either gay/lesbian, bisexual or any other sexual orientation. Males were more likely to identify as LGB+ with the majority aged between 25-44 years (higher proportion aged 24-34 years old). In females, the majority of LGB+ were more likely to be aged between 16-34 years (higher proportion aged 25-34 years old).</p> <table border="1"> <thead> <tr> <th>Sexual Orientation</th> <th>No. of residents</th> <th>% of residents</th> </tr> </thead> <tbody> <tr> <td>Straight or Heterosexual</td> <td>236,553</td> <td>86.5%</td> </tr> <tr> <td>Not answered</td> <td>22,821</td> <td>8.3%</td> </tr> <tr> <td>Gay or Lesbian</td> <td>8,342</td> <td>3.0%</td> </tr> <tr> <td>Bisexual</td> <td>4,762</td> <td>1.7%</td> </tr> <tr> <td>All other sexual orientations</td> <td>1,080</td> <td>0.4%</td> </tr> </tbody> </table>	Sexual Orientation	No. of residents	% of residents	Straight or Heterosexual	236,553	86.5%	Not answered	22,821	8.3%	Gay or Lesbian	8,342	3.0%	Bisexual	4,762	1.7%	All other sexual orientations	1,080	0.4%	<p><u>Tenant profile</u></p> <p>The Housing and Regeneration Department does not currently hold sexual orientation data on tenants.</p>
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<p><b>Across groups i.e. older LGBT service users or Black, Asian &amp; Minority Ethnic young men.</b></p>		<p>Please see above sections (sexual orientation and race / ethnicity). No available data for this section.</p>																		
<p><b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010) Include the following groups:</b></p>		<p><u>Resident population (DataWand):</u></p> <p><u>The Index of Multiple Deprivation (IMD) 2019 is the official measure of relative deprivation for small areas (or neighbourhoods) in England. The IMD combines information from seven domains to produce an overall relative measure of deprivation. The domains are: Income; Employment; Education; Skills and Training; Health and Disability; Crime; Barriers to Housing Services; Living Environment.</u></p>																		

<ul style="list-style-type: none"> <li>• <b>Deprivation (measured by the 2019 English Indices of Deprivation)</b></li> <li>• <b>Low-income groups &amp; employment</b></li> <li>• <b>Carers</b></li> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>	<p><u>The IMD ranks every small area (Lower Super Output Area) in England from 1 (most deprived) to 32,844 (least deprived). Decile 1 represents the most deprived 10% of LSOAs in England while decile 10 shows the least deprived 10% of LSOAs.</u></p> <p><u>Overall, Wandsworth have more areas of lower deprivation than areas of high deprivation. No Lower Super Output Area (LSOA) has been identified as the most deprived decile (decile 1), but 4.5% are decile 2 and 8.9% are decile 3.</u></p> <p><u>Tenant profile:</u></p> <p>The Housing and Regeneration Department does not currently hold comparative tenant or applicant data on socio-economic status.</p> <p>Low-income groups &amp; employment</p> <p>Resident population (DataWand):</p> <p>Income is an important contributing factor to deprivation, increasing LSOAs in Wandsworth in decile 1 from 0% to 1.7%. Of those employed, 85% of people aged 16-64 are in full-time employment and 15% are in part-time employment.</p> <p>Tenant and Homelessness profile:</p> <p>The Housing and Regeneration Department does not currently hold comparative tenant or applicant data on this group.</p> <p>However, as demonstrated through the English Housing Survey 2021/22, social housing tenants are more likely to be lower earners and more likely to be in receipt of benefits when compared to other housing tenures. 57% of tenants receive a form of housing support compared to 25% in private rented sector.</p>
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**Data gaps**

<b>Data gap(s)</b>	<b>How will this be addressed?</b>
<p>Leaseholders – the Council does not hold equalities data on its leaseholders and can therefore not provide comparative analysis for this resident type.</p>	<p>The Council does not collect equality data for its leaseholders and there is currently no plan to commence the collection of leaseholder equality data.</p>
<p>Residents actively involved in the participation structures – the Council does not collect or hold equalities data on residents who are actively involved in the participation structures and can therefore not provide comparative analysis for this resident type.</p>	<p>Equalities monitoring for residents actively involved in our participation structures could commence as long as the data could be kept confidentially and securely. At present, there is no reliable input method to store this data electronically. This issue will be raised to senior staff to determine a plan on how equalities data of actively involved residents can be collected.</p>

<p>As addressed, data on all protected characteristics is not currently collected.</p>	<p>A large proportion of our tenants will have been a tenant of the Council for many years and data is mainly collected once the tenant has signed up to the property. In addition, the Council is mainly collecting data on age, ethnicity, disability and gender, which restricts our ability to provide a richer assessment of other protected groups based on our tenant profile. However, the Housing Services division (covering homelessness and allocations) have begun recording data on religion and sexual orientation, so over time the Department should have a greater capability to report on a higher number of the protected groups.</p>
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**4. Impact**

Protected group	Positive	Negative
<p><b>Age</b></p>	<p>The age profile of tenants living in our high-rise buildings (7 storeys and over) shows those in the younger age groups (54 years and under), reside in such buildings, compared to the tenant profile of our housing stock overall. In particular, there are 5% more tenants aged 25-34 and 4% more tenants aged 35-44 living in our high-rise stock compared to our housing stock overall. This is to be expected, as older tenants would be more likely to move to lower-level accommodation, or properties designated for older people, which are more likely to be low-rise.</p> <p>To increase the number of young people engaged in the participation structures, the Council has introduced steps to increase youth engagement, through using social media and given QR code access to the Strategy, which will be put up inside of our high-rise blocks.</p> <p>Information regarding resident engagement on building safety will also be available via different means to</p>	<p>No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.</p>



	reach all resident types (e.g. notice boards, online and information delivered to residents' doors) to ensure residents of all ages have accessible information and relevant contacts.	
<b>Disability</b>	<p>The percentage of tenants with a disability is higher than the borough average. This is unsurprising considering those with a disability or vulnerability are more likely to be accepted for social housing.</p> <p>The Strategy aims to increase the number of ways for residents to engage with the Council, through formal and informal participation structures, such as the use of a fire safety steering group specifically for those living in high rise buildings, who will be given the option to attend online.</p> <p>Information regarding the building safety of our blocks will also be available via different means to reach all resident types (e.g. notice boards, online and information delivered to residents' doors) to ensure residents with any physical limitations have accessible information and relevant contacts.</p>	No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.
<b>Sex</b>	There is a higher percentage of female tenants compared to the borough average,	No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.
<b>Gender reassignment</b>	Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this	No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in

	group since it sets out a range of new measures to increase engagement for all residents.	our participation schemes to ensure it is representative.
<b>Marriage and civil partnership</b>	Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.	No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.
<b>Pregnancy and maternity</b>	Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.	No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.

<p><b>Race/ethnicity</b></p>	<p>There is a higher proportion of Council tenants from Black, Asian and Minority Ethnic backgrounds (47%) when compared to the whole borough demographic for this group (32%), and a lower proportion of White Council tenants (40%) compared to the whole borough demographic (68%).</p> <p>Considering the higher proportion of Council tenants from Black, Asian and Minority Ethnic backgrounds when compared to the White group, it is expected that a higher proportion of tenants from Black, Asian and Minority Ethnic groups to be involved in the Council's participation structure.</p> <p>Furthermore, the range of participation opportunities are available to residents irrespective of race/ethnicity.</p> <p>Information regarding the building safety of our blocks will also be available via different means to reach all resident types (e.g. notice boards, online and information delivered to residents' doors) and can be translated to any language to ensure residents have accessible information and relevant contacts.</p>	<p>No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.</p>
<p><b>Religion and belief, including non belief</b></p>	<p>Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.</p>	<p>No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.</p>
<p><b>Sexual orientation</b></p>	<p>Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.</p>	<p>No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.</p>

<p><b>Socio-economic status (to be treated as a protected characteristic under Section 1 of the Equality Act 2010)</b>  <b>Include the following groups:</b></p> <ul style="list-style-type: none"> <li>• <b>Deprivation (measured by the 2019 English Indices of Deprivation)</b></li> <li>• <b>Low-income groups &amp; employment</b></li> <li>• <b>Carers</b></li> <li>• <b>Care experienced people</b></li> <li>• <b>Single parents</b></li> <li>• <b>Health inequalities</b></li> <li>• <b>Refugee status</b></li> </ul>	<p>Although we were unable to provide comparative analysis on this protected group for the tenant profile, the strategy will positively impact this group since it sets out a range of new measures to increase engagement for all residents.</p>	<p>No negative impact identified for this particular group. As noted above, we will consider how we can monitor equality data on residents involved in our participation schemes to ensure it is representative.</p>
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#### 5. Actions to advance equality, diversity and inclusion

Action	Lead Officer	Deadline
<p>An annual report analysing equalities data is completed on our tenant profile after the start of a new financial year which is published on the Council website. The annual report provides a breakdown of the tenant profile by age, disability, ethnicity and sex and will be able to identify any negative impact of the proposed change. It is more difficult for the Housing and Regeneration Department to identify a negative impact on the other protected groups due to the reasons as set out above in the Data Gap section, however, the Housing Services division (includes homelessness and allocations) have begun to measure other protected groups such as sexual orientation and religion, and going forward the Department will have larger capacity to start reporting more widely on these groups.</p>	Martina Kane	No deadline – needs further review and consideration

#### 6. Further Consultation (optional section – complete as appropriate)

Consultation planned	Date of consultation
This EINA will be subject to a public consultation alongside the Building Safety Resident Engagement Strategy	TBC