**SSA EQUALITY IMPACT AND NEEDS ANALYSIS**

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| **Directorate** | Housing and Regeneration |
| **Service Area** | Housing Management |
| **Service/policy/function being assessed** | Tenancy and Rent Strategy / Tenancy Policy |
| **Which borough (s) does the service/policy apply to** | Wandsworth |
| **Staff involved in developing this EINA** | Alex Jones |
| **Date approved by Directorate Equality Group (if applicable)** |  |
| **Date approved by Policy and Review Manager**  All EINAs must be signed off by the Policy and Review Manager | 23rd June 2022 |
| **Date submitted to Directors’ Board** |  |

1. **Summary**

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| **Please summarise the key findings of the EINA.**  **Background:**   * Flexible fixed term tenancies (FFTTs) were introduced by the Council in March 2013. These are offered to new social housing tenants so that regular tenancy reviews can be undertaken as a way to ensure tenants’ homes remain suitable in accordance to their housing need, with FFTT reviews intended as a mechanism for freeing up larger properties for households who require them. * FFTTs were not offered to tenants who had been existing social housing tenants as of April 2012, and any tenant who was an existing social housing tenant retained their secure periodic tenancy. * However, despite the intended purpose of FFTTs as providing an effective stock management tool and, to a lesser extent, to aid tenancy management, in practice the benefits to the Council have been minimal, particularly when weighed against the significant cross-Departmental resource involved in their administration. * In addition, legislative changes since 2013 have made the FFTT review process increasingly difficult in cases where the Council would like to offer a different property to the tenant or to end a tenancy, and as a result of such difficulties the FFTT review process has often failed to achieve its intended benefits. * Since FFTTs have been initiated, disparities between tenants who hold either a FFTT or secure tenancy has emerged, with some underrepresented and protected groups receiving a higher percentage of FFTTs compared to their counterparts.   **Proposal:**   * Any new tenants after the date of change will be offered only a secure periodic tenancy if they are offered a property that has 0 to 4-beds; if the property has 5-beds or more, then they will be offered a FFTT. All existing social housing tenants who have a FFTT will also be offered a secure tenancy if they have a 0 to 4-bed property, however the legal mechanism for doing so is yet to be determined. * As of the 31st March 2022, of the Council’s 15,700+ social housing tenants, approximately 18% have flexible fixed term tenancies:  |  |  |  | | --- | --- | --- | | Tenancy Type | No. of tenants | Percentage of tenants | | FFTTs | 2791 | 18% | | Introductory | 342 | 2% | | Secure | 12,604 | 80% | | Grand Total | 15,737 | 100% |  * An immediate consequence of the proposal will mean that most current tenants who have a FFTT will be gradually moved on to a secure periodic tenancy. * Of Council’s 15,700+ social housing tenants, there are only 105 properties that are 5-bedrooms or larger, meaning the impact of using FFTTs for larger properties will not impact the overall effectiveness of removing FFTTs in all other instances. * Of the small number of tenants on introductory tenancies occupying 0 to 4-bed properties, they will be offered a secure periodic tenancy at the end of the introductory tenancy. * Essentially this will impact just over 3000 of our social housing tenants. * The change is a positive change for most our tenants on FFTTs since it means that they will no longer be required to undertake a review of their tenancy and it increase the security of their tenancy.   **Impact:**  Positive:   * Overall, the impact on the above proposal is positive for all WBC social housing tenants, since all existing tenants on FFTTs will be offered a secure tenancy with no future reviews required, and all new tenants after the change will also be offered an automatic secure tenancy. * The proposed change will also help resolve current disparities within protected and underrepresented groups. As the analysis shows below, some protected groups (e.g. tenants under the age of 35 and tenants from minority ethnic backgrounds) hold a higher percentage of FFTTs compared to their counterparts. Once this change is implemented, all tenants will have a secure tenancy which will remove any disparity or imbalance that had previously existed.   Negative:   * There is no identifiable negative impact to residents or existing and future WBC social housing tenants who will be occupying 0 to 4-bed properties. * The analysis identified that there is a higher percentage of some underrepresented / protected groups who require properties that are 5-bedrooms or larger, so keeping FFTTs for the use of 5-bed plus properties may cause some disparities in the type of tenure in which they hold, however, this is seen to be minimal when considering 5-bed plus properties (105 in total) represent only 0.6% of the Council’s housing stock. * Furthermore, FFTT reviews were initially put in place to ensure that tenants are in a home that is suitable for them, and to make it easier for the Council to take action against tenants who have breached the tenancy conditions (e.g. high rent arrears or anti-social behaviour incidences). * Historic performance analysis on housing equalities letting data (<https://www.wandsworth.gov.uk/housing/about-the-housing-department/housing-and-equalities/>) suggests that underrepresented groups (e.g. applicants from minority ethnic groups and younger residents) have a greater housing need compared to their counterparts and represent a higher proportion of applicants on the housing queues. * It is therefore arguable that removing FFTTs could potentially impact applicants on the housing waiting list since applicants may face longer waiting times if the Council can no longer intervene (via a FFTT review) and allocate households (who are under occupying) a smaller property to free up larger properties for households in need of them. * However, an analysis of the performance data since FFTT reviews started (March 2018) indicates that the FFTT review process has not aided the freeing up larger properties. Since 2018, there have been approximately 1400+ FFTT reviews, and only 7 (0.5%) of the reviews that did take place were made an offer of a different property as a result of a FFTT review, with 3 of the 7 being offered a different property due to under-occupation.  |  |  |  |  |  | | --- | --- | --- | --- | --- | | Decision / Outcome | Original recommendation | | Final outcome | | | No. of cases | % of cases | No. of cases | % of cases | | Renewal | 1388 | 96.4% | 1369 | 95.1% | | Different property | 11 | 0.8% | 7 | 0.5% | | No offer /eviction / resident moved | 41 | 2.8% | 64 | 4.4% |  * The above table shows the number and percentage breakdown by decision on the FFTT review cases, with the second column representing the original recommendation from the deputy area housing manager and the third column representing the actual outcome at the end of the review process. Under the ‘actual outcome’ column, in the ‘no offer’ row, an estimated 4 to 6 of these were successful evictions, with the remaining cases either intentionally or unintentionally turning secure period. * It is reasonable to conclude that the potential negative impact of the Council no longer being able to ‘claw back’ larger properties from the FFTT review process is a moot point since the use of FFTTs will be kept for households occupying the largest properties (5-bed plus), and the overall effectiveness of FFTTs on identifying and clawing back larger properties has been minimal. For this reason, applicants on the waiting list will not be impacted by a change in policy and strategy of offering only secure tenancies to existing, new and future tenants. |

1. **Evidence gathering and engagement**

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

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| **Evidence** | **Source** |
| **Breakdown of projected resident projections based on residents ethnicity, age and gender.** | **Data Wand for all protected groups:**  **- age, ethnicity and gender data were sourced via the 2020 GLA data**  **- disability data was sourced via the ONS 2011 census data.** |
| **Data from our internal records on our tenant profile.** | **Tenant profile (by ethnicity, age, disability and gender) as of 31st March 2022.** |
| **Data from our internal records on our access queue (housing register)** | **Number of applicants on the housing register awaiting an offer of social housing as of June 2022.** |
| **Historic annual equalities reports** | **A reference is made to previously published equality letting reports** |
| **Annual Housing Resources and Commitments for 2021/22 (Paper No. 21-140), Appendix 2** | **The total number of social housing allocations made throughout the financial year (2021/22) by bedroom size.** |

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

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| **Individuals/Groups** | **Consultation/Engagement results** | **Date** | **What changed as a result of the consultation** |
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1. **Analysis of need**

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

At present, of the Council’s 15,700+ tenants, 18% of them are on flexible fixed term tenancies (FFTTs), which means that these tenants are required to undertake a review of their tenancy to determine whether their tenancy should or should not be renewed, and they have far less security compared to the other 80% of our tenants who undertake no tenancy reviews.

To obtain an accurate breakdown of our tenants by protected characteristics, our end of year tenant profile (as of 31st March 2022) was obtained which provides a reliable update on the makeup of our tenants by some protected characteristics, which was also compared against the applicants who are on the housing register (identified via our own internal records) and also compared against the data listed on [Data Wand](https://www.datawand.info/population/#/view-report/bc09062460a64f7bb8a9891258b449b2/___iaFirstFeature) reflecting the 2020 GLA projections of the borough demographic. The alternative comparator was to use the 2011 census data, though the 2020 GLA projections are a far superior comparator since they reflect the most recent updates, with the 2011 census data being over 12 years out of date. The 2011 census data was only used to identify residents that have a disability / health condition.

The end of year tenancy profile was broken down by tenancy type and bedroom size to indicate the tenants who will be impacted by the proposed changes i.e. tenants on flexible fixed term tenancies (by property size). The housing register was broken down by household size and compared against previous letting outcomes (e.g. number of lets throughout the financial year by bedroom size), thus allowing us to determine the potential impact and outcome of this strategy change.

Only 4 out of the 9 protected characteristics could be compared as a comparator against the DataWand data since reliable internal data does not exist for all protected characteristics. The protected characteristics where sufficient data allowed for analysis are age, disability, ethnicity and sex.

Details of the analysis are below.

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| **Protected group** | **Findings** |
| **Age** | Residents under the age of 35 represent a larger proportion of the Wandsworth Borough (52%) when compared to residents aged 35 +, although under 35s have a significantly lower proportion of secure tenancies when compared to over 35s. The proposed changes would therefore positively benefit under 35s who are currently underrepresented in regards to holding secure periodic tenancies, meaning a more equal and fairer balance of most residents having the same security of tenure. Residents and tenants from the age of 65+ would mostly be unimpacted since most tenants in the older age groups already have secure periodic tenancies prior to these proposed changes.   |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | Age Group | Tenancy types | | | | Borough population | | | FFTTS | Introductory | Secure periodic | Total WBC tenants | No. of residents | % of residents | | Under 25 | 3% | 13% | 0% | 1% | 90,663 | 27% | | 25 to 34 | 31% | 27% | 5% | 10% | 80,418 | 24% | | 35 to 44 | 29% | 20% | 15% | 17% | 60,355 | 18% | | 45 to 54 | 22% | 15% | 22% | 22% | 39,212 | 12% | | 55 to 64 | 10% | 15% | 25% | 22% | 27,088 | 8% | | 65 to 74 | 4% | 8% | 17% | 14% | 17,627 | 5% | | 75+ | 1% | 2% | 16% | 13% | 14,373 | 4% | | Grand Total | 18% | 2% | 80% | 100% | 329,736 | 100% |   Households with a 5-bed plus housing need:  The table represents all the households who are on the housing register waiting for an offer of social housing by bedroom size. The 45 to 54 age group represent 46% of the 281 applicants who are waiting for a property that is 5-bedrooms or larger and are thus overrepresented when considering they make-up only 16% of all households who are on the housing register for any bedroom size. However, as an example, out of the 581 Council properties that were let to households from the housing register, only seven of these were let to households who required a 5-bed plus property, and from April 2022 to July 2022, no 5-bed plus properties have yet been let due to a shortage of supply.  Therefore, even if households who are offered a 5-bed plus property are issued a FFTT – and they were in the 45 to 54 age group – the actual number of tenancies issued is so low when compared to the tenancies let for all other bedrooms size that the issuing of FFTTs for larger properties would not put any particular group at an overall disadvantage since the supply is so low.   |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | **Age groups** | **0 to 4-beds** | | **5-bed plus** | | **All beds** | | | % of applicants | no. of applicants | % of applicants | no. of applicants | % of applicants | no. of applicants | | Under 25 | 8% | 877 | 0% | 0 | 8% | 877 | | 25 to 34 | 28% | 3127 | 3% | 9 | 28% | 3136 | | 35 to 44 | 31% | 3394 | 24% | 68 | 31% | 3462 | | 45 to 54 | 16% | 1731 | 46% | 129 | 16% | 1860 | | 55 to 64 | 11% | 1186 | 24% | 67 | 11% | 1253 | | 65 to 73 | 4% | 478 | 2% | 5 | 4% | 483 | | 75+ | 2% | 261 | 1% | 3 | 2% | 264 | | Grand total | 100% | 11054 | 100% | 281 | 100% | 11335 | |
| **Disability** | There are comparative data limitations for this protected group, since the only comparative data available is the ONS Census 2011 data, which [Data Wand](https://www.datawand.info/health-and-social-care/#/view-report/4acfcd2aa276400fbaf158b93de712cd/___iaFirstFeature) is also reliant on.  To ascertain the likely number of residents in the borough with a disability, it is best to look at whether the resident is classified as being limited to complete activities, with approximately 11.2% of residents in Wandsworth having a health condition which limits their activities on a daily basis.  As of the 31st March 2022, the percentage difference of all tenants with a disability that have a FFTT (10%) or secure tenancy (12%) is not significantly different, so the proposed change to move to only secure tenancies will not significantly impact this protected group.   |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | Disability | Tenancy types | | | | Borough population | | | FFTTS | Introductory | Secure periodic | Total WBC tenants | No. of residents | % of residents | | No | 90% | 83% | 88% | 88% | 272,609 | 89% | | Yes | 10% | 17% | 12% | 12% | 34,386 | 11% |   Households with a 5-bed plus housing need:  Of the 94 applicants on the housing register waiting for an adapted property due to their disability, only four require a 5-bed plus property. This is a very low number of applicants when compared the total number of applicants that require an adapted property. Therefore, only a very small number of applicants would be issued with a FFTT if offered a 5-bed plus adapted property, and offering FFTT in such cases would not put households with a disability at a significant disadvantage when compared to households without disabilities.   |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | **Disability** | **0 to 4-beds** | | **5-bed plus** | | **All beds** | | | % of applicants | no. of applicants | % of applicants | no. of applicants | % of applicants | no. of applicants | | No | 99% | 10964 | 99% | 277 | 99% | 11241 | | Yes | 96% | 90 | 4% | 4 | 100% | 94 | | Grand Total | 100% | 11054 | 100% | 281 | 100% | 11335 | |
| **Sex** | There are a far higher number of female tenants (67%) compared to male tenants (33%). The current percentage breakdown between male and female tenants on FFTTs compared to secure tenancies is not significantly different, so there will be no identifiable impact once the change to secure tenancies has been initiated.   |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | Sex of the tenant | Tenancy types | | | | Borough population | | | FFTTs | Intro | Secure | Total | No. of residents | % of residents | | Female | 70% | 61% | 67% | 67% | 171,673 | 52% | | Male | 30% | 39% | 33% | 33% | 158,062 | 48% |   Households with a 5-bed plus housing need:  Of the 281 households requiring a 5-bed plus property, 203 of them are female, however, the overall number of female applicants requiring a property of any bedroom size is 7210. Furthermore, the number of actual 5-bed plus properties due to be let to households waiting for larger properties is significantly lower than the demand, with only seven 5-bed plus properties being let during 2021/22 and zero have been let from April 2022 to July 2022. Therefore, the issuing of FFTTs for 5-bed plus properties will not put any particular group into a disadvantage since the supply is so low.   |  |  |  |  |  |  |  | | --- | --- | --- | --- | --- | --- | --- | | **Sex** | **0 to 4-beds** | | **5-bed plus** | | **All beds** | | | % of applicants | no. of applicants | % of applicants | no. of applicants | % of applicants | no. of applicants | | Female | 63% | 7007 | 72% | 203 | 64% | 7210 | | Male | 37% | 4047 | 28% | 78 | 36% | 4125 | | Grand Total | 100% | 11054 | 100% | 281 | 100% | 11335 | |
| **Gender reassignment** | No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, there would likely be no negative impact on this protected group since the proposed changes of using secure periodic tenancies in most instances is a positive change for existing and new tenants, and the use of FFTTs for 5-bed plus properties will not cause any disadvantage to protected groups due to the shortage of the supply of such properties. |
| **Marriage and civil partnership** | No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, there would likely be no negative impact on this protected group since the proposed changes of using secure periodic tenancies in most instances is a positive change for existing and new tenants, and the use of FFTTs for 5-bed plus properties will not cause any disadvantage to protected groups due to the shortage of the supply of such properties. |
| **Pregnancy and maternity** | No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, there would likely be no negative impact on this protected group since the proposed changes of using secure periodic tenancies in most instances is a positive change for existing and new tenants, and the use of FFTTs for 5-bed plus properties will not cause any disadvantage to protected groups due to the shortage of the supply of such properties. |
| **Race/ethnicity** | |  |  |  | | --- | --- | --- | | Ethnic Group | No. of residents | % of residents | | Asian | 37,848 | 11% | | Black | 35,813 | 11% | | Mixed | 20,516 | 6% | | Other | 5,415 | 2% | | White | 233,140 | 70% |   Approximately 70% of residents describe themselves as White, compared to 30% of residents who are from Black, Asian and Minority Ethnic backgrounds. However, when looking at Wandsworth Council tenants, 40% of all tenants are White and 47% of tenants are from minority ethnic backgrounds, signifying a greater housing need for those from minority ethnic backgrounds compared to their White counterparts. Furthermore, when looking at each protected group of tenants from Black, Asian and Minority Ethnic backgrounds, there are clear differences between groups, 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, although both the Black and Asian ethnic group each represent 11% of all residents in the borough. 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-the-housing-department/housing-and-equalities/>)  Tenure split is again divided, with White tenants making up 43% of secure tenancies and 31% of FFTTs, while tenants from a minority ethnic background make up 44% of secure tenants and 62% of FFTTs. Therefore, under the current system, underrepresented groups from minority ethnic background have less security of tenure compared to white tenants.  The proposed changes will ensure that all existing and new tenants (from all ethnic groups) will be issued with the same level of tenure (e.g. secure) thus removing the current imbalance between white and minority ethnic tenants.  Households with a 5-bed plus housing need:  There is a greater housing need for 5-bed plus properties for households in the Black, Asian and Minority Ethnic group, who represent 239 (85%) of the 281 applicants requiring a 5-bed plus property, and represent 6340 (57%) of all households requiring a property of any size.  However, the housing supply of 5-bed plus properties is very low, with seven of these property types let to households during 2021/22, and zero let between April 2022 to July 2022. Therefore, any household offered a 5-bed plus property on a FFTT will not put the protected group at an overall disadvantage when considering the very low number of households this will impact. |
| **Religion and belief, including non belief** | No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, there would likely be no negative impact on this protected group since the proposed changes of using secure periodic tenancies in most instances is a positive change for existing and new tenants, and the use of FFTTs for 5-bed plus properties will not cause any disadvantage to protected groups due to the shortage of the supply of such properties. |
| **Sexual orientation** | No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, there would likely be no negative impact on this protected group since the proposed changes of using secure periodic tenancies in most instances is a positive change for existing and new tenants, and the use of FFTTs for 5-bed plus properties will not cause any disadvantage to protected groups due to the shortage of the supply of such properties. |
| **Across groups i.e older LGBT service users or Black, Asian & Minority Ethnic young men.** | No comment – the Housing and Regeneration Department (HRD) does not currently hold tenant data on this. However, there would likely be no negative impact on this protected group since the proposed changes of using secure periodic tenancies in most instances is a positive change for existing and new tenants, and the use of FFTTs for 5-bed plus properties will not cause any disadvantage to protected groups due to the shortage of the supply of such properties. |

**Data gaps**

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| **Data gap(s)** | **How will this be addressed?** |
| Disability – old data was used | Once the 2021 census data is released there will be more up to date data on number / percentage of residents who have a disability / health condition that causes them activity limitations. |
| As addressed, data on all protected characteristics is not currently collected. | 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. This is something we can consider changing going forward, however, there will still be limitations since we may only be able to collect data on new tenants rather than existing tenants, since we will need to rely on existing tenants to contact us to provide us with data. |

1. **Impact**

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| **Protected group** | **Positive** | **Negative** |
| **Age** | At present, there are a disproportionate percentage of tenants under 35 holding FFTTs compared to tenants aged 35+, resulting in under 35s having less secure tenure. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage any group since the expected numbers of 5-bed plus to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |
| **Disability** | All tenants with a disability occupying a 0-4 bed property who are on a FFTT (including new / future tenants) will be moved to a secure tenancy, offering long term reassurance. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage disabled households since the expected numbers of 5-bed plus adapted properties to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |
| **Sex** | Most tenants (regardless of sex) on FFTTs will be moved to a secure tenancy. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage any group since the expected numbers of 5-bed plus to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |
| **Gender reassignment** | Although we were unable to provide comparative analysis on this protected group, there will still be a positive impact since any tenants who have undergone gender reassignment and are currently on a FFTT (occupying a 0 to 4-bed property) will be offered a secure tenancy. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage any group since the expected numbers of 5-bed plus to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |
| **Marriage and civil partnership** | Although we were unable to provide comparative analysis on this protected group, there will still be a positive impact since any tenants who are married or in a civil partnership and are currently on a FFTT (occupying a 0 to 4-bed property) will be offered a secure tenancy. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage any group since the expected numbers of 5-bed plus to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |
| **Pregnancy and maternity** | Although we were unable to provide comparative analysis on this protected group, there will still be a positive impact since any tenant who is pregnant or has recently given birth and are currently on a FFTT (occupying a 0 to 4-bed property) will be offered a secure tenancy. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage any group since the expected numbers of 5-bed plus to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |
| **Race/ethnicity** | At present, there are a greater percentage of white tenants on secure tenancies compared to tenants from minority ethnic groups, who hold a larger and disproportionate number of FFTTs. The proposal to issue secure periodic tenancies to all existing, new and future tenants who are occupying a 0 to 4-bed property will mean all tenants have the same tenancy type, thus removing current disparities. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage any group since the expected numbers of 5-bed plus to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |
| **Religion and belief, including non belief** | Although we were unable to provide comparative analysis on this protected group, there will still be a positive impact since all tenants (regardless of their beliefs) who are currently on a FFTT (occupying a 0 to 4-bed property) will be offered a secure tenancy. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage any group since the expected numbers of 5-bed plus to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |
| **Sexual orientation** | Although we were unable to provide comparative analysis on this protected group, there will still be a positive impact since all tenants (regardless of sexual orientation) who are currently on a FFTT (occupying a 0 to 4-bed property) will be offered a secure tenancy. The impact of issuing FFTTs for properties that are 5-bed plus will not disadvantage any group since the expected numbers of 5-bed plus to be let to are very low and rare, and the use of FFTTs for 5-bed plus properties in such cases allows more flexibility for the Council to ensure properties that are in scarce supply are suitably let to benefit those with the greatest housing need. | No negative anticipated. |

1. **Actions to advance equality, diversity and inclusion**

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| **Action** | **Lead Officer** | **Deadline** |
| 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, going forward the Department can consider how it can best rectify this. | Alex Jones | No deadline – needs further review and consideration |

1. **Further Consultation (optional section – complete as appropriate)**

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| **Consultation planned** | **Date of consultation** |
| Consultation will take place with residents, registered providers of social housing within Wandsworth and with resident management organisations on the proposed change from FFTTs to secure periodic tenancies (including offering secure periodic tenancies to existing tenants on FFTTs). | 17th October 2022 to 11th December 2022 |