

# Equality Impact Assessment (EqIA)

Submission reference: EQIA-66922211

## Details

**Title of proposal:**

EqIA for Local Lettings Plan for RP Schemes - revised

## Proposal details

**Type of activity being assessed:**

A new policy

**Please describe the aims and outcomes of the proposal being assessed:**

The Local Lettings Plan is being produced in order to ringfence 229 new homes being delivered by housing associations in Newham for households living in temporary accommodation. The homes are across three sites: Gallions 3B LAR, Ibis Hotel Silvertown, Twelvetrees/Stephenson St and 7-11 Barking Road.

The LLP is in response to the high cost of temporary accommodation. It will be read alongside the allocations policy only in the named schemes, and allocations will continue to be made via the allocations policy in all other new lettings.

**The planned implementation date of the proposal (if known):**

**What corporate priority does this fall under?:**

Homes for our residents

**Which of the following does the proposal affect?:**

Residents, Employees of Newham Council

**Is a specific geographical area, neighbourhood or ward affected by this proposal?:**

Yes

**Which of the following does it affect?:**

Boleyn, Canning Town South, Forest Gate North, Royal Docks, West Ham

## Pre-assessment

**Will this proposal affect any of the protected characteristics groups listed below more than other groups?:**

Age, Disability, Pregnancy and maternity, Sex, Socio-economic deprivation

**Are there gaps in information that make it difficult to form an opinion on how your proposal might affect people from protected characteristic groups?:**

Yes

**Will the proposal impact how a service or council function is delivered, maintained or accessed?:**

Yes

**Does the proposal involve a significant commitment or withdrawal of resources (over Â£500,000)?:**

No

**Does this proposal affect a statutory service?:**

Yes

## Evidence, consultation, engagement

**Have you collected any evidence (including data or research findings) on affected groups?:**

Yes

**Provide a summary of your findings from data collection and evidence, including a description of the sources of information used:**

The evidence used compares the demographic profiles of households in temporary accommodation with that of households who have been housed via the housing register in the twelve months leading up to 18th November 2024. Both datasets are from data collected by the Council. The aim is to understand whether there is any group with a protected characteristic which would be unfairly advantaged or disadvantaged as a result of the introduction of a Local Lettings Plan which prioritises households in temporary accommodation for a defined set of new properties. The evidence indicates that the two cohorts are broadly similar, and where they do diverge, this tends to benefit groups with protected characteristics, for example women and people with children. The two protected groups that the data suggests would be less likely to be housed via the LLP than the housing register are people aged 60+ and people with disabilities. However any disabled-adapted new properties to which the Council has nomination rights (both within and outside the schemes covered by the LLP) are ringfenced for people with disabilities so in practice they would have the same likelihood of accessing an adapted property regardless of the LLP. Households where the main applicant is over 60+ are underrepresented among households in temporary accommodation but unlike younger groups they do have additional access to sheltered accommodation, which is considered to mitigate this disadvantage.

**Have you carried out any consultation or engagement with affected groups?:**

No

**Provide a summary of your consultation or engagement activities, including a description of whether you have carried out consultation or engagement, what methods you have used, and who you have consulted or engaged with:**

**Provide a summary of why you do not need to carry out any consultation activities:**

A local lettings plan adds to, rather than alters, the allocations process therefore a public consultation is not required. It is also a non-key decision, undertaken by the Assistant Director of Housing Needs and Supply under delegated authority.

**Impact of proposal**

**What impact will this proposal have on people of different ages?:**

Neutral

**Please explain how you came to this conclusion:**

For both cohorts, the two largest age groups are 30-39 and 40-49, and they are similarly high across each cohort. 30-49 year-olds make up 59% of households in temporary accommodation and 57% of those housed via the Housing Register and would therefore have a similarly high probability of being housed via the Local Lettings Policy as those who are housed via the housing register.

Overall, the distribution of ages between the two cohorts is very similar, with 30-39 and 40-49 being the most common age group for both. There is a slightly lower share of households with a main applicant aged over 60 among households in temporary accommodation than among households housed via the Housing Register. Where only 8.9% of households in temporary accommodation are aged over 60, the over 60s comprise 17.9% who are housed via the Housing Register. This may be because households in their 30s, 40s and 50s are more likely to have dependent children and to be owed a homelessness duty, thereby becoming overrepresented among households in temporary accommodation.

Although over 60s may be less likely to be housed via the LLP, it is important to note that they have access to sheltered

accommodation, a pool of housing which younger age groups are unable to access, mitigating the slight disadvantage they may face in securing housing via the LLP.

**How will you mitigate the impact of your proposal?:**

**What impact will this proposal have on people with different disabilities?:**

Neutral

**Please explain how you came to this conclusion:**

Households with a disability make up a much smaller share of households in temporary accommodation than among households housed via the Housing Register. However the LLP does ringfence wheelchair accessible accommodation for those with a medical need which will mean that households with a physical disability (requiring a wheelchair-accessible property) make up a larger share of those housed via the LLP than of the general population of households in temporary accommodation.

**How will you mitigate the impact of your proposal?:****What impact will this proposal have on people of different ethnic groups and nationalities?:**

Neutral

**Please explain how you came to this conclusion:**

The distribution of broad ethnic groups is extremely similar between the two groups, indicating that the use of an LLP to allocate some properties would not unfairly indicate any broad ethnic group.

Drilling down further into the ethnic data as far as it allows, the two figures included in Appendix 1 show remarkable

similarity. Across both cohorts, the largest groups for households housed via the Housing Register and in temporary accommodation are British Bangladeshi (16.4% and 17.7% respectively) and Black African (17.5 and 19% respectively).

The greatest discrepancy can be found among White British applicants, where they make up 13.7% of households housed

via the Housing Register but only 8.8% of households in temporary accommodation. This is still a very small gap of less than 5% so a mitigation is not considered to be required.

**How will you mitigate the impact of your proposal?:****What impact will this proposal have on people of different gender identities than the gender they were assigned at birth or people seeking to undergo or have undergone gender reassignment surgery?:**

No impact

**Please explain how you came to this conclusion:**

The Council has not thus far collected data on how many residents currently in temporary accommodation are transgender, and the data on households on the housing register is incomplete. However a report by Stonewall in 2018 found that, alongside other vulnerabilities, one in four trans people had experienced homelessness at some point. The Census indicates that 1.51% of the population of Newham has a gender identity different from that which they were assigned at birth, the highest share nationally. However Newham also had the highest rate nationally of people who answered "No" to the question but did not provide a write-in response (0.91%) which may be indicative of a misunderstanding of the question, particularly given the large proportion of the population who speak English as a second, third or fourth language. This limits our ability to assess the impact of the LLP on trans people in Newham.

**How will you mitigate the impact of your proposal?:****What impact will this proposal have on people who are married or in a civil partnership?:**

No impact

**Please explain how you came to this conclusion:**

Whether a household includes adults who are married or cohabiting has no impact on how their housing case is treated by the Council.

**How will you mitigate the impact of your proposal?:****What impact will this proposal have on people who are pregnant or undertaking maternity or paternity leave?:**

Positive

**Please explain how you came to this conclusion:**

In order to make a direct comparison, the evidence base compares bedroom need as a proxy for whether or not a household has children. There is a much higher share of households housed via the housing register with a need for a one-bedroom property, indicating a higher rate of single-person households and couples. This may be because, as noted above, households having children (or a pregnant applicant) is the main reason for acceptance of a homelessness duty and placement in temporary accommodation. This indicates that the LLP will benefit households with children. Also as noted above women tend to head single-parent households, suggesting a bias in favour of maternity.

**How will you mitigate the impact of your proposal?:**

**What impact will this proposal have on people of different religious faiths or beliefs:**

No impact

**Please explain how you came to this conclusion:**

No data was available on the religion or belief of households housed via the housing register since this is not taken into account as part of making housing decisions. The data on households in temporary accommodation is incomplete. It is therefore not possible to draw firm conclusions as to the impact of the introduction of the LLP on the protected characteristic of religion or belief.

**How will you mitigate the impact of your proposal?:**

**What impact will this proposal have on people of different sexual orientations?:**

Positive

**Please explain how you came to this conclusion:**

There is incomplete data around the sexual orientation of households housed in temporary accommodation and no data on the sexual orientation of households housed by the housing register.

A 2015 study by the Albert Kennedy Trust found that, nationally, LGBT+ people are more likely to find themselves homeless than their non-LGBT+ peers. Young LGBT+ people may comprise up to 24% of the youth homeless population.

This suggests that the share of people in temporary accommodation who are not heterosexual could be larger than the data currently indicates. Further, the stigma that LGBT+ people continue to face in many parts of society might make people reluctant to disclose their sexual orientation. We can therefore suggest that there may be a slight benefit to households which include an LGBT+ member.

**How will you mitigate the impact of your proposal?:**

**What impact will this proposal have on different sexes?:**

Positive

**Please explain how you came to this conclusion:**

The data indicates that in both cohorts households where the main applicant is female make up the majority, although this is more pronounced among households in temporary accommodation. There are several reasons for this trend. Having children or being pregnant is a priority need category (meaning the Council will owe the household a homelessness duty), and female single parents are more likely than male single parents to be primary carers for children. Additionally, women have statistically lower earnings and may also be required to work reduced hours, depend on Universal Credit and/or cover childcare costs as a result of their caring responsibilities, increasing their likelihood of falling into arrears and being made homeless.

The LLP is therefore likely to benefit women more than men. However given the position of relative disadvantage of women in society, this is considered to be a positive equalities impact.

**How will you mitigate the impact of your proposal?:**

**What impact will this proposal have on people who are socio-economically disadvantaged?:**

Positive

**Please explain how you came to this conclusion:**

Housing affordability and households falling into arrears in the private rented sector is a key driver of homelessness. For this reason, households in temporary accommodation are likely to be socio-economically disadvantaged, and are the key beneficiaries of this LLP.

**How will you mitigate the impact of your proposal?:**

**What impact will this proposal have on people with different levels of health and well-being?:**

No impact

**Please explain how you came to this conclusion:**

There is no data on the health and wellbeing of households housed via the housing register and in temporary accommodation.

**How will you mitigate the impact of your proposal?:**

**Overall impact:**

Low

**Please provide a summary of why you have rated your overall impact high/medium/low/no impact, and of mitigating action to be taken to reduce the disproportionate and undue impacts on the groups identified in your assessment above:**

As noted in the summary, the two protected groups that the data suggests would be less likely to be housed via the LLP than the housing register are people aged 60+ and people with disabilities. However any disabled/adapted new properties to which the Council has nomination rights (both within and outside the schemes covered by the LLP) are ringfenced for people with disabilities so in practice they would have the same likelihood of accessing an adapted property regardless of the LLP.

Households where the main applicant is over 60+ are underrepresented among households in temporary accommodation but unlike younger groups they do have additional access to sheltered accommodation, which is considered to mitigate this disadvantage.

Therefore no specific mitigating actions are required.

**Next review**

**Frequency of review:**

**Next review date:**

**Does this EqlA contain information which would prevent publication on the Council's website?:**

No