

Equality Impact Assessment

Directorate: Regeneration, Housing and Resources	
Service: Housing	
Name of Officer/s completing assessment: S Abyan , C Ford	
Date of Assessment: December 2016	
Name of service/function or policy being assessed:	
1.	<p>What are the aims, objectives, outcomes, purpose of the policy, service change, function that you are assessing?</p> <p>The provision of suitable housing for local residents is essential for improving equality in Slough. It affects all groups of people but has a significant impact on our most vulnerable residents. The impact of poor housing can be devastating, and the lack of appropriate and affordable housing not only impacts upon current residents but also on those who might wish to live and work in Slough in the future. For example, lack of affordable and quality housing deters key public sector workers – such as teachers and health care professionals who are essential for the running of public services, often to the most vulnerable and disadvantaged groups- from moving into the area.</p> <p>The situation in Slough reflects a crisis in housing nationally: lack of supply to meet increasing demand and rising property and rental prices which mean that a significant proportion of households in Slough, or looking to live in Slough, simply cannot afford market prices and rent. Substantially more homes are required and many of them they need to be “affordable”: Therefore some intervention is required.</p> <p>The refreshed Housing Strategy sets out this proposed intervention. It is a statutory document which councils produce to set out their vision and priorities for housing in the Borough. The strategy takes into account the Council’s Five Year Plan (2016-21) and its housing priorities including the growth agenda and the drive to improve quality across all tenures and sectors. It contains an analysis of the nationally and locally changing operating environment, including the changing customer needs and expectations, new legislation and the reduction in resources. Based on the issues and challenges identified and the resources available to the Council it then sets out the key priorities and the direction of travel for the next five years.</p> <p>The council is realistic about how far it can influence private sector market conditions. However, we can intervene to:</p> <ul style="list-style-type: none"> - .ensure the c. 7000 homes that the council provides are the best possible quality and go to those residents most in need of them

	<ul style="list-style-type: none"> - improve standards in the private rented sector (where over 28% of Slough residents live, higher than the national average of 17%) - have early prevention strategies to reduce homelessness (on the increase), - Increase wherever possible the amount of homes built and available - ensure that the most vulnerable have appropriate adaptive housing that meets their needs <p>The strategy therefore has the following 5 areas of focus:</p> <ol style="list-style-type: none"> 1. New housing supply 2. Private sector housing 3. Council homes 4. Homelessness and housing need 5. Special housing needs and vulnerable groups
2.	<p>Who implements or delivers the policy, service or function? State if this is undertaken by more than one team, service, and department including any external partners.</p> <p>This strategy will be delivered by the Housing Services and Neighbourhood Services teams in line with the accompanying action plan. However, some aspects of this strategy will be delivered in partnership with a number of other Council teams and external partners.</p>
3.	<p>Who will be affected by this proposal? For example who are the external/internal customers, communities, partners, stakeholders, the workforce etc. Please consider all of the Protected Characteristics listed (more information is available in the background information). Bear in mind that people affected by the proposals may well have more than one protected characteristic.</p> <p>Age: Yes Disability: Yes Gender Reassignment: Yes Marriage and Civil Partnership: Yes</p>

Pregnancy and maternity: Yes

Race: Yes

Religion and Belief: Yes

Sex: Yes

Sexual orientation: Yes

Other:

The Housing Strategy will impact all equality groups as demonstrated above. However, those who have **low incomes**, or rely on **benefits** are most impacted by the current and projected shortage of affordable housing. The current Strategic Housing Market Assessment (SHMA) report indicates that 1/5 of all households in the SHMA area had an income **of less than £20,000** with a following 1/3 of households earning between 20-40K per annum.

In Slough (mid 2014) the medium household income was £28, 816 and the mean income was £37,952.

The SHMA identifies the **minimum** affordable purchase level household income to be £50,000

For the minimum level rents in the following sectors, households would need the following minimum incomes:

Private rental sector : £ 23, 100

Affordable rent (subsidised to 80 % of market value) £18,500

Social Rent £15,000

Analysis of demographic and housing data indicates that living on low incomes or benefits disproportionately affects some ethnic groups, older people, young people leaving care, single parents (the majority of whom are women) , and those with a disability.

Please see section 6 for a full break down of available data sets. Although not all data sets are complete, the council collects monitoring information on Tenants, Leaseholders, Applicants and Temporary Accommodation Tenants.

The council is in the process of updating its information on Private Rented Homes.

4. **What are any likely positive impacts for the group/s identified in (3) above? You may wish to refer to the Equalities Duties detailed in the background information.**

The council recognises that a large proportion of residents either privately rent (28%) or own/mortgage (52%) their home. Rising house prices increase pressure on the rental market, where there is insufficient supply of suitable properties to meet demand. Therefore the main focus of the strategy has to be on substantially increasing the number of affordable homes – to support those people who cannot afford market rents or prices. The strategy offers several interventionist approaches to increase the delivery of new homes to own and rent and increase this supply (by 200 per year), across a range of rents. It also offers a robust regulatory approach to ensure high standards amongst private sector landlords, where poor housing conditions are most commonly found.

The council's most valuable asset is its 7000 tenanted and leasehold homes. These are an essential resource to those households on low incomes and especially vital for vulnerable and disabled residents, who may not be able to work. The Strategy offers specific interventions to ensure that council homes are managed and maintained to a high standard. Unfortunately, demand far outstrips supply and the council will need to review its eligibility criteria for access to council homes to reflect those most in need (it will look at increasing priority to those young people leaving care and those with disabilities – this will be subject to a separate EIA).

The specific equalities benefits of successfully implementing the Strategy are as follows:

Age

Young people make up a significantly larger proportion of Sloughs population when compared with other south east local authorities. Young people are being priced out of the Slough homeownership market, including a swing to 'generation rent' in line with countrywide trends. Consistent with the rising house prices and low wage, high employment levels this strategy should allow the Council to meet the growing demand for affordable homes for young people by facilitating the building of more affordable homes.

Nearly 40% of applications for social housing include children under the age of 15 years of age, reflecting the high need for families with dependent children and family homes.

Children under the age of 15 years make up c. 50% of households in Temporary Accommodation Tenants (consistent with the council's objectives to support families with young children). Therefore, by specifically tackling homelessness under Theme 4 this strategy should positively impact children and young people who have the most severe need for priority housing in a crisis. Another potential positive impact for young people in the borough comes from the strategy's proposals seeking to provide suitable and affordable priority social housing for those leaving care. (Themes 1 & 5).

The overall impact of The Housing Strategy on older people is expected to be positive as it seeks to address future challenges resulting from a growing older population in Slough. The SHMA estimates that the number of people over 65 is projected to grow by 40% in the next 10 years and the Council is planning to provide new specialist and alternative accommodation to cater for this increasing demand (Theme 5). In order to tackle many of the medium and long term strategic issues facing older people in the borough this strategy will bring together the appropriate Council departments and agencies concerned to develop a long-term strategy which promotes and supports independent living. As older people are also disproportionately likely to own their homes outright or live in social housing this strategy will benefit older people through targeted support aimed at improving the standard of existing Council and privately owned properties (Theme 2 and 3).

Disability

The exact number of Slough's disabled population is unknown and is a gap in the Council's data. In 2011 around 18,787 (13%) adults in Slough had a limiting long term illness or disability according to the census, and was projected to rise by over 50% by 2036, therefore, requiring particular attention.

The Housing Strategy recognises the needs of people with disabilities and seeks to address these through a range of provisions. These include improving housing options for people with disabilities via the new build programme (Theme 1), working with Council teams and external partners to support disabled people to live independently in their own homes and reducing the impact of poor housing on their health (Theme 2). It also encourages other local authorities placing families in Slough to notify the Council of their specific support needs so that the appropriate local support services can be provided where necessary on arrival (Theme 2).

The strategy's proposals to improve the Council's approach to ensuring that it better understands the mobility needs of residents who require adapted properties should have a positive impact on the approximately 9,322 residents between the ages of 16 and 65 living in Slough with a physical disability. The strategy should also benefit people with disabilities by supporting adults living with learning difficulties and long term mental health issues and by addressing the growing levels of dementia suffered by older people in the Borough.

Disabled people are more likely to be over represented in social housing. Currently, 13% of tenants have declared at **least one** disability (although many have multiple disabilities). 6% of applicants for social housing have declared a disability – the revised allocation policy will consider how best to prioritise eligibility to reflect the increased need of disabled residents. 4% of that tenant in temporary accommodation had declared a disability.

Race

Slough is one of the most ethnically diverse local authority areas outside of London and in the United Kingdom. Appendix B shows the ethnicity statistics for Slough from the 2011 Census (it is very likely to have increased in diversity over the past 5 years).

Approximately 35 % of the population identify themselves as white British, with nearly 10% defining as “white other” (largely from Poland and other parts of Eastern Europe following EU enlargement). 40% of residents declared as Asian or Asian British and 9% declaring as Black or Black British.

There is a considerable margin of error in the ethnicity data sets for Tenants, Applicants and Temporary Accommodation Tenants, with up to 20% “unknown”.

However, it is clear that there is some overrepresentation from particular groups. At least 40% of council tenants are from BME back grounds, with 6.5% declaring as “white other”, 21% as Asian and Asian British, and 9% as Black or Black other. After the White British cohort, the Pakistani cohort forms 15% of council tenants.

BME households are overrepresented among housing applicants and homeless households.

For applicants, 10.5 % are from “white other” background, 16% are from Black/Black British backgrounds and nearly 25% are from Pakistani backgrounds.

In Temporary Accommodation tenants, around 30% tenants are from Black/Black British backgrounds.

By building more truly affordable homes, tackling and preventing homelessness and improving the quality of existing housing this strategy should lead to a positive outcome for people from all ethnic groups, but especially those most impacted by low incomes. Slough has nearly 14,000 people in council housing and as such the strategy’s £100 million investment in improving the existing stock and also the realisation of the service improvements from the planned new repairs; maintenance and investment contract (Theme 3) should also impact them positively.

Gender

According to the 2015 mid-year estimates of the 2011 Census, from the 145,734 people in Slough the male/female gender split is approximately 50/50. This strategy is likely to have a net positive impact on both men and women in Slough due to the additional supply of

new affordable homes and the investment in existing stock. The proposal to review services for older people, improve and maintain the quality of council homes and to deliver high quality housing management services will also benefit women who are overrepresented among council tenants, across all groups and tend to outlive men.

Gender Breakdown:

Tenants: 54% women, 46% men;

Applicants: 53% women, 47% men;

Temporary Accommodation Tenants: 56% women, 44% men

Slough has more lone parent households with dependent children than the national average. Approximately 92.5% of these lone parent households are female and lone parent households tend to experience greater levels of deprivation and economic and housing need than households made of couples. Furthermore, lone parent women are also over-represented in homeless acceptances and temporary accommodation in Slough. So by developing a diverse mix of affordable homes (Theme 1) and improving the current standard of both private and council housing (Themes 2 & 3) this strategy should positively impact women heading up lone parent households. The focus on reducing and better managing homelessness in Slough could also positively benefit lone parent female households including the measures set out in Theme 4, such as developing a new preventing homelessness strategy.

Pregnancy & Maternity / Marriage & Civil Partnership / Religion & Belief / Sexual Orientation / Gender Reassignment

There is insufficient data to assess the impact of this strategy on these protected characteristic, however, there is no significant reason to believe that it will impact people based on any of these characteristics.

5. What are the likely negative impacts for the group/s identified in (3) above? If so then are any particular groups affected more than others and why?

The Housing Strategy should have a net positive overall impact on the council's equality duties. However, there are some areas where due care needs to be taken in order to ensure that the strategy does not negatively impact any specific group more than others. It is also important to note that planned reductions in benefit caps, and other changes to government housing policy will affect household rent affordability in the future .At the time of writing this Strategy the Government is introducing a number of changes through the Housing and Planning Act and other legislation which will have a major impact on the future of council homes in the Borough. Chief amongst these are;

- The Government has taken control of council rents and these will fall by 1% in each of the 4 years from 2016/17. While this

benefits existing tenants it will have a major impact on the Housing Revenue Account (HRA), including money available for investment;

- From April 2017 the Council will be forced to sell some of its higher - value homes as they become empty and pass some of the proceeds to the Government;
- The Government is changing the rules on new council tenancies and the granting of fixed-term as opposed to lifetime tenancies. This will not affect the position of existing tenancies.

These changes are being introduced at the same time as further measures to reform the benefit system, particularly the reduction in the Overall Benefit Cap and the further rollout of Universal Credit, both of which could significantly affect the finances of individual tenants and the HRA itself.

Age

An area of concern which may have a negative impact on people either directly or indirectly as a result of their age is the insufficient Council data analysing young people's housing need and affordability requirements. Therefore, in order to ensure that the proposed introduction of a wider range of affordable rents does not discriminate against young people by restricting their access to social housing, further work is required to understand what affordable really means for young people in the Borough.

Disability

The Housing Strategy will in the main benefit people with disabilities in Slough, however, when implementing the strategy due regard must be taken to ensure that it is inclusive and does not discriminate against people with disabilities. For example, the Council must ensure that the new homes being built are as accessible as possible in order to cater for the growing number of residents with physical disabilities in the borough.

Race

There are a higher proportion of BME applicants on the housing register in need of larger homes; therefore, when deciding the makeup of new housing supply the Council will need to make sure that it does not discriminate against any particular group. As such the Council will carefully consider how far a cultural or community need can be accommodated, within the constraints of supply, to reach a proportionate and pragmatic outcome for the applicant in need, balanced against practical considerations such as cost and availability of resources. Similarly, any review of eligibility of criteria for allocation will need to consider the impact on ethnic groups.

Gender

Women in Slough are paid less than men and are more likely to have low incomes and find themselves as lone parents.,When implementing this strategy the Council must take into account affordability when setting the rent levels for new affordable housing so as to make sure women have equal access.

Pregnancy & Maternity / Marriage & Civil Partnership / Religion & Belief / Sexual Orientation / Gender Reassignment

There is insufficient data to assess the impact of this strategy on these protected characteristics; however, there is no significant reason to believe that it will negatively impact people based on any of these characteristics.

6. Have the impacts identified in (4) and (5) above been assessed using up to date and reliable evidence and data? Please state evidence sources and conclusions drawn (e.g. survey results, customer complaints, monitoring data etc).

Yes. The following internal and external evidence and data sets have been used:

- Profile of Council residents
- Profile of homeless households who the Council has a duty to rehouse (past 12 months)
- Profile of applicants of the housing register (housing waiting list)
- The Strategic Housing Market Assessment (SHMA)
-
- The Joint Strategic Needs Assessment (JSNA)
- The Slough Story
- ONS data
- 2011 Census
- Public Health England's Slough Profile
- Joseph Roundtree Foundation - Monitoring poverty and social exclusion 2016 (MPSE)

There is insufficient equalities data on Leaseholders and this has not been included.

There is insufficient data across all tenants with regard to sexual orientation, religion, and marital status and this has been disregarded.

Sufficient data sets exist for age, gender, ethnicity and disability status although there are gaps due to "unknown" statuses.

7.	<p>Have you engaged or consulted with any identified groups or individuals if necessary and what were the results e.g. have the staff forums/unions/ community groups been involved?</p> <p>The Council intends to consult with a number of relevant groups at a borough wide conference in early 2017. Additionally, it will follow the required statutory consultation process in order to get the views of a variety of different groups.</p>
8.	<p>Have you considered the impact the policy might have on local community relations?</p> <p>Housing is a major issue for local people. In particular, demand for social housing far outstrips supply and any perception of unfair or discriminatory allocations and priorities will impact negatively on community relations.</p> <p>The Council, and its partners, have limited resources and directing resources to address any one issue potentially diverts resources from other actions. The effect of this could result in community tension if some groups are perceived to be treated more favourably. However, the Housing Strategy mitigates this impact by contributing to advancing equality of opportunity between different groups by promoting understanding through on-going engagement and involvement of residents, in particular through resident scrutiny and involvement of residents in helping to shape the service (Theme 4).</p> <p>Another area negatively impacting community relations is the higher rents and house prices in Slough over the last couple of years. Consequently, this strategy seeks to alleviate these community tensions by providing more needed affordable housing in Slough. Further work as captured in the action plan below will also need to be done in order to truly understand what affordable homes are required by the community.</p>
9.	<p>What plans do you have in place, or are developing, that will mitigate any likely identified negative impacts? For example what plans, if any, will be put in place to reduce the impact?</p> <p>Both the Allocations Policy and the Preventing Homelessness Strategy will have separate Equality Impact Assessments.</p>
10.	<p>What plans do you have in place to monitor the impact of the proposals once they have been implemented? (The full impact of the decision may only be known after the proposals have been implemented). Please see action plan below.</p> <p>The Housing Strategy will include a yearly review and an assessment of the impact of the proposals discussed in this document on the key groups identified, age, gender, disability and race. Performance targets will be set up, as will any monitoring against the above key Equalities groups in order to feed into the annual review of the action plan and subsequent strategies.</p>

What course of action does this EIA suggest you take? More than one of the following may apply	✓
Outcome 1: No major change required. The EIA has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken	x
Outcome 2: Adjust the policy to remove barriers identified by the EIA or better promote equality. Are you satisfied that the proposed adjustments will remove the barriers identified? (Complete action plan).	
Outcome 3: Continue the policy despite potential for adverse impact or missed opportunities to promote equality identified. You will need to ensure that the EIA clearly sets out the justifications for continuing with it. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact (see questions below). (Complete action plan).	
Outcome 4: Stop and rethink the policy when the EIA shows actual or potential unlawful discrimination. (Complete action plan).	

Action Plan and Timetable for Implementation

At this stage a timetabled Action Plan should be developed to address any concerns/issues related to equality in the existing or proposed policy/service or function. This plan will need to be integrated into the appropriate Service/Business Plan.

Action	Target Groups	Lead Responsibility	Outcomes/Success Criteria	Monitoring & Evaluation	Target Date	Progress to Date
An analysis of young people in Slough linked to affordability.	Young people & Low earners	HoHS		Via Housing Strategy Action Plan	June 2018	
A review how the Council collects housing equalities data.	All	HoHS		Via Housing Strategy Action Plan	June 2018	
Develop performance monitoring framework for the key equalities	Age, sex, disability and race	HoHS		Via Housing Strategy Action Plan	June 2018	

groups identified above.						
Preventing Homelessness Strategy + Equality Impact Assessment	All	HoHS		Via Housing Strategy Action Plan	Sept 2017	
Allocations Policy + Equality Impact Assessment	All			Via Housing Strategy Action Plan	May 2017	
Name: Signed:(Person completing the EIA)						
Name: Signed:(Policy Lead if not same as above)						
Date:						