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Equality Impact Assessment (EqIA)

Name: Emma Brunskill-Powell

Email: Emma.Brunskill-powell@newham.gov.uk

Job title: Housing Strategy Manager

Which Corporate Director or Assistant Director is responsible for this proposal: Candida Thompson (Assistant Director of Housing Options & Supply)

Director (approver) email: Candida.Thompson@newham.gov.uk

Title of proposal you are assessing: Local Lettings Plan for Royal Eden Docks, Manor Road, Gallions 2b, and Deanston Wharf

Type of activity being assessed: A new policy

Please describe the aims and outcomes of the proposal being assessed: This Local Lettings Plan (“LLP”) forms part of the Council’s overall Housing Allocation Scheme and is introduced under Section 5, page 13 of the Council’s Housing Allocations Scheme, November 2022 (“the Scheme”).

It is made pursuant to the provisions of s.166A(6) Housing Act 1996 under which the Council’s Scheme may contain provision about the allocation of particular housing accommodation to persons of a particular description.

The LLP concerns the allocation of new social rent and affordable rent homes, built and delivered by Registered Providers at 4 schemes within the borough, to which the Council is able to nominate persons to be assured tenants. Through this LLP, the Council will manage these nominations and prioritise lettings to homeless households for whom the Council has accepted the main housing duty under section 193(2) of the Housing Act 1996 and who are currently placed in temporary accommodation.

A key element of this LLP is that the new housing provision at the 4 schemes is used to reduce the numbers of homeless households living in nightly paid temporary accommodation.

The planned implementation date of the proposal (if known): 18/09/2023

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?: No

Will this proposal affect any of the protected characteristics groups listed below more than other groups?: Age, Disability, Pregnancy and maternity, Sex, Sexual orientation, 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

Do you know that the proposal will have a negative impact on people with protected characteristics?: No

Does the proposal involve a significant commitment or withdrawal of resources (over £500,000)?: No

Does this proposal affect a statutory service?: Yes

needFullEqIA: yes

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 EqIA finds that there are no negative equalities implications to the allocation of the RSL properties covered by the local lettings plan (LLP) for Royal Eden Docks, Manor Road, Gallions 2b, and Deanston Wharf to households in temporary accommodation. This is on the basis that the demographic characteristics of homeless households is similar to that of households housed via the housing register in 2022/23 and Newham's population overall. This indicates that no protected characteristic group would be unfairly advantaged or disadvantaged through the implementation of the local lettings policy.

Have you carried out any consultation or engagement with affected groups?: No

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 Director of Housing under delegated authority.

Consultation has been carried out with Cllr Carlene Lee-Phakoe, Cabinet Member for Housing Needs, Homelessness and Private Rented Sector and Cllr Mohammed, Cabinet Member for Housing Management and Modernisation.

Upload supporting documents (e.g. full consultation write-up): Evidence base for EqIA for Local Lettings Plan for Royal Eden Docks, Manor Road, Gallions 2b, and Deanston Wharf v2.docx

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

Please explain how you came to this conclusion: The age ranges provided for households in temporary accommodation and Newham residents overall differ from those used in the data on households housed via the housing register. However while not directly comparable, a similar pattern emerges whereby the head of the majority of homelessness approaches (88%) are aged 25-59 and the head of the majority of households housed (71%) is aged 20-59. There is a slight disparity in that a slightly smaller share of households in temporary accommodation have a head tenant aged over 60 (9%) compared with those who are housed through the housing register (13%), meaning that the LLP confers a very slight benefit on younger age groups as they are more likely to be in temporary accommodation.

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

Please explain how you came to this conclusion: Specialist accommodation such as wheelchair accessible or adapted properties in the schemes covered by the LLP are ringfenced for households on the housing register who have a need for such a home.

Although there is no data around the share of households in temporary accommodation, table 3 sets out the share of households whose homelessness duty was accepted as a result of mental health and physical disability/ill health. Although this doesn't indicate exactly what proportion of the temporary accommodation population has a disability, we can reasonably estimate that approximately 5% of households in temporary accommodation have a physical disability given the mean of 5% over the eight years studied. According to the same logic, 8% of households in temporary accommodation likely have a homelessness duty owed as a result of a mental health issue. This brings the total to 13% of the population having a mental or physical disability or ill health, compared with 27% of those housed through the register. By contrast, the 2021 Census found that 17.5% of Newham residents have a disability. While this analysis indicates that fewer people with disabilities may be housed by the LLP, the share of households housed would be generally representative of the share of the Newham population with disabilities.

What impact will this proposal have on people of different ethnic groups and nationalities?: No impact

Please explain how you came to this conclusion: Only grouped ethnicities were available across all three key datasets, so this may obscure some differences between more specific ethnic groupings. However table 6 indicates very similar ethnic profiles of lead tenants of households in temporary accommodation and those housed via the housing register. One anomaly is the strong overrepresentation of households with a Black lead tenant in both temporary accommodation and being housed through the housing register, when compared with the general Newham population. This is an issue that is common across local authorities nationally, and reflective of wider issues around racism, discrimination and disproportionality. Overall, no ethnic group appears to be advantaged or disadvantaged by the LLP.

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. 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.

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.

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: The most common household type to be placed in temporary accommodation is a female single parent with children – this household type makes up almost a third of all households in temporary accommodation. When both single and couple households (with male and female main applicants) are considered, 69% of all households in temporary accommodation have children, or a pregnant woman, as part of the household.

There is no available data on the share of households housed via the housing register with children. However assuming most households housed into non-sheltered housing with two or more bedrooms are likely to include children, an estimated 55% of households housed included children. This aligns with the 56.8% of the Newham population that lives in a single-family household according to the Census.

This indicates that slightly more families with children are likely to benefit from the LLP than other household types, particularly lone parent families, which make up only 14% of Newham’s population but 33% of the temporary accommodation population.

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 on 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.

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.

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

Please explain how you came to this conclusion: Women appear to be make up a larger share of the temporary accommodation population than men, comprising almost two-thirds of those placed in temporary accommodation. As noted in the pregnancy and maternity section above (see table 5), the most common household type in temporary accommodation is made up of a single women with children. Having children or being pregnant is a priority need category, and female single parents are more likely than their male counterparts to be primary carers for children.

For households housed via the housing register, households where the lead tenant is female are still slightly overrepresented. However the LLP is likely to benefit women more than men. However given the position of relative disadvantage of women in society, this is not considered to be a negative equalities impact.

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

Please explain how you came to this conclusion: Socioeconomic deprivation is likely to affect households both in temporary accommodation and being housed via the housing register. Arrears or an inability to afford alternative housing are common causes of homelessness, and households housed through the housing register must have a high degree of housing need.

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

Please explain how you came to this conclusion: See response on disability above

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: The LLP will advantage households headed by women and single-parent families, who are often particularly vulnerable to the impacts of discrimination and disproportionality - this is therefore seen as a positive equalities impact.

It slightly disadvantages older people and those with disabilities, but given the small number of homes being allocated through the LLP, this is considered to be of small impact.

Frequency of review: 6 months

Next review date: 18/03/2024

Does this EqlA contain information which would prevent publication on the Council's website?: No